



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: WESTMORELAND

POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 10-3-01  
MDJ Name: Hon. MARK MANSOUR  
Address: 174 SOUTH GREENGATE RD.  
GREENSBURG, PA 15601  
Telephone: 724-836-1010

DEFENDANT: (NAME and ADDRESS):  
BROOKE NICOLE CROSS  
First Name Middle Name Last Name Gen.  
7501 142<sup>ND</sup> AVE. NORTH  
LOT 469  
LARGO, FL 33771  
724-518-3243

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-60-19 Date Filed 2-13-19 OTN/LiveScan Number U678191-3 Complaint/Incident Number A01-1969890 Request Lab Services? ☐ YES ☒ NO

GENDER ☐ Male ☒ Female DOB 12/19/91 POB PENNSYLVANIA Add'l DOB Co-Defendant(s) ☐  
AKA First Name: Middle Name: Last Name: Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.) 120

FBI Number MNU Number Ft. HEIGHT In. 5 3

Defendant Fingerprinted ☐ YES ☒ NO

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

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. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CHRISTOPHER COLE  
(Name of Affiant - Please Print or Type)

00638746/10564  
(PSP/MPPOETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop A, Greensburg  
(Identify Department or Agency Represented and Political Subdivision)

PAPSP3400  
(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 is 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:

209 MULTIPLE PHARMACIES LOCATED WITHIN  
(Subdivision Code) WESTMORELAND AND FAYETTE COUNTIES  
(Place-Political Subdivision)

in WESTMORELAND County 64  
(County Code)

on or about 06/21/2015-02/02/2016 AT VARIOUS TIMES  
(Offense Date)



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 60-19</i>	Date Filed: <i>2-13-19</i>	OTN/LiveScan Number <i>U678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name	First: BROOKE	Middle: NICOLE	Last: CROSS

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>1</b>	780-113	(a)(12)	of the	Title 35, C.S.D.D.C.A.	1	F		18( )/35A
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT by his/her conduct or conduct of another did knowingly and intentionally acquire or obtain possession of approx. 798 Buprenorphin (Subutex) 8mg pills, a schedule 3 controlled substance, from Multiple area pharmacies by misrepresentation, fraud, forgery, deception or subterfuge, namely, the DEFENDANT and CO-DEFENDANTS caused prescriptions to be telephoned in to pharmacies fraudulently using Dr. Nabil JABBOURS name and DEA #, in violation of Section 780-113(a)(12) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>2</b>	911	(b)(3)	of the	Title 18, PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(3) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: <i>C.R. 60-19</i>	Date Filed: <i>2/13/19</i>	OTN/LiveScan Number <i>U678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name	First: BROOKE	Middle: NICOLE	Last: CROSS

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>3</b>	911	(b)(4)	of the	Title 18 , PA Crimes Code	1	F1		/
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Offense #      Section      Subsection      PA Statute (Title)      Counts      Grade      NCIC Offense Code      UCR/NIBRS Code

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity the DEFENDANT did conspire to violate the provisions of paragraph 3 of this section. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(4) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>4</b>	903	(a)(1)	of the	Title 18 , PA Crimes Code	1	F1		/90Z
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Offense #      Section      Subsection      PA Statute (Title)      Counts      Grade      NCIC Offense Code      UCR/NIBRS Code

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

## Criminal Conspiracy

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, with the intent of promoting or facilitating the crime of , did conspire and agree with Rebekah CARWITHEN, Sabrina THOMAS, Rhonda ANTHONY, Jacqueline KEYS and Adam FINCIK that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of telephoning fraudulent prescriptions into area pharmacies utilizing the identity of Dr. Nabil JABBOUR as well as his DEA number to obtain Buprenorphine (Subutex) by diversion / fraud, in violation of Section 903(a)(1) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR. 60-19</i>	Date Filed: <i>2-13-19</i>	OTN/LiveScan Number <i>U678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name	First: BROOK	Middle: NICOLE	Last: CROSS

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	4101	(a)(2)	of the	Title 18 , PA Crimes Code	1	F3		100/250
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## Forgery

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did make, complete, execute, authenticate, issue or transfer any writing so that it purports to be the act of who did not authorize the 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, said alteration being, the DEFENDANT caused fraudulent prescriptions to be telephoned/filled/dispensed/picked up and diverted from their intended lawful use utilizing the identifying information of Dr. Nabil JABBOUR including his DEA#, with intent to defraud or injure Dr. Nabil JABBOUR and multiple pharmacies, in violation of Section 4101(a)(2) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	6	4120	(a)	of the	Title 18 , PA Crimes Code	1	F3		110/
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## Identity Theft

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did possess or use, through any means, identifying information of another person, namely, Dr. Nabil JABBOUR age 64 at the time, without the consent of said person, to further the unlawful purpose of fraudulently obtaining prescriptions by using Dr. JABBOUR'S name, and DEA # to telephone in multiple prescriptions to local pharmacies, in violation of Section 4120(a) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-60-19</u>	Date Filed: <u>2-13-19</u>	OTN/LiveScan Number <u>0678191-3</u>	Complaint/Incident Number A01-1969890
Defendant Name	First: BROOK	Middle: NICOLE	Last: CROSS

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 14
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

FEBRUARY 13, 2019  
(Date)

(Signature of Affiant)

AND NOW, on this date, FEB 13 2019 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)

Mark Mansour  
Magisterial District Judge  
Westmoreland County PA  
My Commission Expires  
1st Monday in January 2022



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 60-19</i>	Date Filed: <i>2-13-19</i>	OTN/LiveScan Number: <i>U678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name:	First: Brooke	Middle: Nicole	Last: CROSS

## AFFIDAVIT of PROBABLE CAUSE

I am a sworn member of the Pennsylvania State Police, assigned to the Criminal Investigations Unit at Troop A Greensburg. I have been employed by the Pennsylvania State police since January of 2007. I have been involved in and investigated a multitude of police incidents from property crimes to criminal homicides. The information contained in this affidavit is derived from interviews of involved persons, personal observations and knowledge of this investigation.

On or around December of 2015, I was made aware of a group of individuals who were operating in the Westmoreland and Fayette County areas. This specific group of individuals were causing fraudulent prescriptions to be telephoned in to area pharmacies utilizing Dr. Nabil JABBOUR's identifying information, including his name and Drug Enforcement Administration (DEA) assigned number without his knowledge or consent. JABBOUR's identifying information along with specific information for prescriptions to obtain controlled substances were provided to the pharmacy by individuals within this group. This caused the pharmacy to fill and dispense these fraudulent prescriptions which were then paid for and picked up by individuals within this group. An investigation into this group of individuals resulted in the identification of several of these individuals. These individuals and their actions surrounding these crimes are detailed below.

Sabrina THOMAS was interviewed during this investigation. THOMAS related that she had been employed as the Office Manager for N. JABBOUR. Through her employment prior to becoming office manager, she learned that another known employee had been using JABBOUR's identifying information to obtain fraudulent prescriptions. She decided to start obtaining fraudulent prescriptions herself. While working in her capacity as office manager, she became friendly with a patient named Brooke CROSS. THOMAS and CROSS agreed that THOMAS would use JABBOUR's personal identifying information and DEA number to call in fraudulent prescriptions using CROSS's personal information. THOMAS called in two prescriptions, one for Buprenorphine and one for Gabapentin. CROSS then went and picked up the prescriptions. CROSS kept the Buprenorphine and provided the prescription for Gabapentin to THOMAS. THOMAS is also responsible for calling in other prescriptions in conjunction with CROSS picking them up.

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

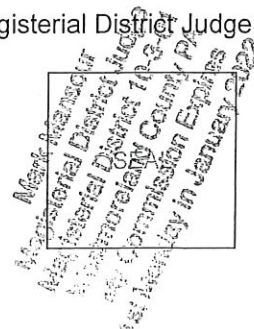
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

  
(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

2-13-19 Date , Magisterial District Judge

My commission expires first Monday of January,







**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR 60-19</i>	Date Filed: <i>2-13-19</i>	OTN/LiveScan Number: <i>U678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name:	First: Brooke	Middle: Nicole	Last: CROSS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

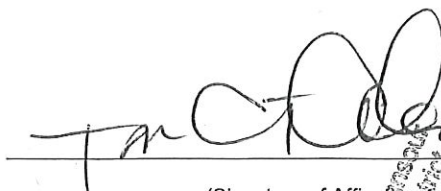

This relationship between THOMAS and CROSS continued. At one point, CROSS was providing other people's names and dates of birth to THOMAS. THOMAS would call in the prescriptions to various local pharmacies and CROSS would pick them up. THOMAS eventually grew tired of making all of the phone calls and provided CROSS with JABBOUR's DEA number and information required for CROSS to call the prescription in herself. CROSS then began to make the phone calls to the pharmacy herself. She knows that CROSS was eventually caught picking up a prescription in New Stanton at a pharmacy. Once this happened, CROSS told her to erase all of her messages and not contact her any longer. THOMAS went on to admit that she had called in prescriptions to the Uniontown, PA Walmart using her boyfriend Ronald KINGAN's name. She also admitted to using her own name and calling in prescriptions with JABBOUR's DEA number.

Brook CROSS was interviewed during this investigation. She indicated that she was once a patient of JABBOUR's. According to CROSS, she started going to Dr. JABBOUR's in Greensburg due to an addiction problem she had with pain pills. She went there for a "detox" program. Since she had insurance, Dr. JABBOUR did a quick detox program for her which did not work. She felt the program was too short and she was not completely "weened" off of the pain pills upon completion of the program. She was approached by Sabrina THOMAS with an offer similar to that described by THOMAS. CROSS allowed THOMAS to use her demographic information and she admitted that she fraudulently obtained the prescriptions described by THOMAS. She also admitted to obtaining a prescription for Gabapentin in her name for THOMAS. She admitted to calling in and picking up multiple of the identified prescriptions in this investigation. She admitted that she called in prescriptions under other individuals names and identifying information while using Dr. JABBOUR's name and DEA #. Phone records confirm that CROSS's phone called area pharmacies on dates and times which correspond to identified fraudulent prescriptions. Video surveillance was also obtained for a majority of the identified fraudulent prescriptions. CROSS is seen on surveillance footage on multiple days picking up fraudulent prescriptions. CROSS identified Jaqueline KEYS as another person who obtained a prescription resulting from this fraud. She told investigators that KEYS also picked up fraudulent prescriptions in her boyfriend Adam FINCIK's name.

I went through photographs from surveillance with CROSS. She cooperated and identified herself and other members of this group in the frames picking up fraudulent prescriptions.

Rebekah CARWITHEN was interviewed as a part of this investigation. Her name was used to obtain fraudulent prescriptions with JABBOUR's DEA #. CARWITHEN was friends with CROSS. CARWITHEN admitted that she was a heroin addict and provided CROSS with her name and identifying information so that she could get suboxone or money so she wouldn't be sick from heroin withdrawal. CROSS told CARWITHEN that she had a friend named Sabrina who worked for a doctor who would take people's names, call in prescriptions. CROSS would pick up the prescription and some type of split would be made between CROSS and THOMAS.

CONTINUED

  
(Signature of Affiant)  
  
2-13-19  
Magistrate District Judge  
Magisterial District Judge  
Pennsylvania  
Commission Expires  
1st Monday in January 2022





**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>U60-19</i>	Date Filed: <i>2/13/19</i>	OTN/LiveScan Number: <i>U678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name:	First: Brooke	Middle: Nicole	Last: CROSS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**


Rhonda ANTHONY was interviewed as a part of this investigation. She admitted that she had been involved with this identified group of individuals who were using Dr. JABBOUR's name and DEA number to obtain fraudulent prescriptions. She was approached by CROSS with this idea as a way to make some extra money. CROSS told her that she had a friend who worked at a doctor's office who could call in prescriptions and that all they would have to do was pick them up. ANTHONY would provide names to CROSS who would then in turn pass the name to her friend who would call in the prescription. She admitted to being a part of this group of individuals and admitted to picking up several fraudulent prescriptions for Buprenorphine. ANTHONY would immediately sell the pills for money or she would give them to her daughter Rebeka CARWITHEN who was a recovering heroin addict. ANTHONY was viewed on surveillance video picking up fraudulent prescriptions. She was identified by a pharmacist at the New Stanton Pharmacy after she was asked to provide her driver's license while picking up a verified fraudulent prescription for Buprenorphine in her mother's name (Shirley ORBIN).

Jaqueline KEYS was interviewed as a result of this investigation. KEYS knows CROSS through a mutual friend. KEYS indicated that her boyfriend Adam FINCIK was in need of a prescription for suboxone as he was taking it without a prescription. CROSS told her that there was a girl that worked at the front of the doctor's office that she knew would get the prescription. She named this girl as "Sabrina". KEYS provided FINCIK's information to CROSS who in turn gave it to THOMAS. THOMAS then called in the prescription using Dr. JABBOUR's name and DEA #. THOMAS called CROSS back and told her where she had called in the prescription. KEYS admitted to picking up this prescription on 07/31/15.

At one-point, CROSS asked KEYS to call Sabrina and act like KEYS was CROSS's sister. CROSS came to KEYS' residence and asked her to call Sabrina and act like her sister to talk her into getting her more prescriptions. She went on to relate that at some point Sabrina apparently became suspicious that CROSS was being watched by the police. She related that she agreed to help CROSS and text/speak with Sabrina from her cell phone. She related that she had told Sabrina that CROSS had gone to Ohio. She related that CROSS did most of the texting and when Sabrina wanted to talk on the phone, KEYS did the talking. KEYS related that she told Sabrina that BROOKE left for Ohio because she was beat up by her boyfriend. This was all in an attempt to get THOMAS to call in more prescriptions. KEYS admitted to picking up at least one prescription for Buprenorphine from a local pharmacy in Adam FINCIK's name. She indicated that her boyfriend Adam FINCIK picked up at least one prescription for Buprenorphine in his own name. Phone records indicate that KEYS and THOMAS had phone contact multiple times. KEYS was identified through video footage as being with CROSS when she picked up a fraudulent prescription in Robert CRAVEN's name. She went on to describe that she was there as a "decoy". The "decoy's" job was to distract CROSS as they went to the pharmacies to pick up these fraudulent prescriptions since CROSS was extremely nervous. She had nothing further to relate.

Adam FINCIK was interviewed as a part of this investigation. He related that KEYS is his girlfriend and that they have children together. He admitted to picking up a fraudulent prescription in his name. He also admitted that he never went to a doctor to get this prescription, he did not pay a co-payment, nor did he undergo a urine test to receive this prescription. He knew that he would need to see a doctor, undergo a urine drug test to have a prescription for suboxone filled. He knew this because he had previously been to another doctor to obtain this exact prescription.

**CONTINUED**

  
(Signature of Affiant)  
*2-13-19*  
Mark Mansour  
Magistrate District Judge  
Weirfield District 10-3-0  
My Commission Expires  
1st Monday in January 2022





**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CE60-19</i>	Date Filed: <i>2/13/19</i>	OTN/LiveScan Number: <i>0678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name:	First: Brooke	Middle: Nicole	Last: CROSS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Dr. Nabil JABBOUR was interviewed and indicated that the only person out of those mentioned above who has ever been a patient of his was CROSS. She was only a patient for a short period of time. He did not authorize the calling in of any prescriptions for CROSS other than the ones linked to her care. He also has never called in or authorized to be called in prescriptions for CARWITHEN, CROSS, ANTHONY, KEYES, FINCIK or any of the other names used and identified on the prescriptions that this group was using JABBOUR's information to have filled. JABBOUR indicated that the prescriptions were not issued by him and not issued pursuant to his employment as a medical doctor. He did not authorize the use of his name, identifying information or DEA for these purposes

The additional known fraudulent prescriptions listed below were called in and obtained using Dr. Nabil JABBOUR's name, identifying information and DEA #.

On 06/21/15, a telephoned prescription was received at the Medicine Shoppe in Greensburg, PA in the name Brooke CROSS for Gabapentin 800mg, 120 count. This prescription was picked up by CROSS.

On 07/22/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled. Twenty of the pills were picked up on 07/22/15. Eight of the pills were picked up on 07/23/15. Two of the pills were picked up on 07/24/15. Seven of the pills were picked up on 07/25/15. Three of the pills were picked up on 07/26/15. The remaining two pills were picked up on 07/27/15. Brooke CROSS picked up the pills on each of these dates.

On 07/31/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15 by Jaqueline KEYS.

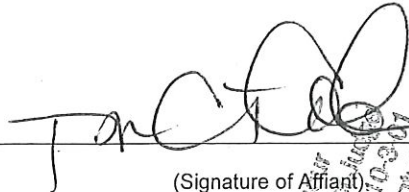

On 08/05/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/05/15 by CROSS.

On 08/17/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15. By his admission, FINCIK picked up this prescription.

On 08/21/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/21/15 by CROSS.

On 08/26/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/26/15, this prescription was picked up Brooke CROSS.

**CONTINUED**

  
(Signature of Affiant)  
  
2/13/19  
Mark Mansur  
Magisterial District Judge  
Westmoreland County PA  
1st Monday Expires  
1st Monday in January 2022



**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR-60-19</i>	Date Filed: <i>2-13-19</i>	OTN/LiveScan Number: <i>0678191-3</i>	Complaint/Incident Number A01-1969890
Defendant Name:	First: Brooke	Middle: Nicole	Last: CROSS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 09/04/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/04/15 by Brooke CROSS.

On 09/08/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/08/15 by CROSS.

On 09/16/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert J. CRAVEN, for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/16/15 by Rhonda ANTHONY.

On 09/18/15 a telephoned prescription was received at Greensburg Wal Mart under the name Becca CARWITHEN, for Buprenorphine (Subutex) 8mg, 42. This prescription was filled and was picked up on 09/18/15 by Brooke CROSS.

On 09/28/15, a telephoned prescription was received at Greensburg Wal Mart under the name Shirley ORBIN, for Buprenorphine (Subutex) 8mg 42 count. This prescription was filled and was picked up on 09/28/15 by Brooke CROSS and Rhonda ANTHONY.

On 09/30/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/30/15 by CROSS.

On 10/02/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/02/15 by CROSS and Rhonda ANTHONY.

On 10/06/15, a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN, for Buprenorphine (Subutex) 8mg 42 count, and Clonidine .1mg 30 count. This prescription was filled and was picked up on 10/06/15 by unidentified white male who arrived and left with Brooke CROSS.

On 10/12/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/12/15 by Brooke CROSS.

On 10/16/15, a telephone prescription was received at the North Huntingdon Walmart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/16/15 by Brooke CROSS and Rhonda ANTHONY.

On 10/21/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/21/15 by CROSS and Rhonda ANTHONY.

CONTINUED

*[Signature]*  
(Signature of Affiant)  
*[Signature]* 2-13-19  
Mark Marone  
Allegheny County District Attorney  
1st Deputy in January 2022





COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: WESTMORELAND



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 10-3-01  
MDJ Name: Hon. MARK MANSOUR  
Address: 174 SOUTH GREENGATE RD.  
GREENSBURG, PA 15601  
Telephone: 724-836-1010

DEFENDANT: (NAME and ADDRESS):  
REBEKAH RENEE CARWITHEN  
First Name Middle Name Last Name Gen.  
516 2<sup>ND</sup> ST.  
MONESSEN, PA 15062  
724-309-0098

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-63-19 Date Filed 2/13/19 OTN/LiveScan Number U678194-L Complaint/Incident Number A01-1969890 Request Lab Services? ☐ YES ☒ NO

GENDER ☐ Male ☒ Female DOB 05/27/94 POB PENNSYLVANIA Add'l DOB Co-Defendant(s) ☐  
AKA First Name: Middle Name: Last Name: Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.) 150

FBI Number MNU Number Ft. HEIGHT In.

Defendant Fingerprinted ☐ YES ☒ NO 5 7

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because:  
(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CHRISTOPHER COLE  
(Name of Affiant - Please Print or Type)

00638746/10564  
(PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop A, Greensburg  
(Identify Department or Agency Represented and Political Subdivision)

PAPSP3400  
(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 is 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:

209 MULTIPLE PHARMACIES LOCATED WITHIN  
(Subdivision Code) WESTMORELAND AND FAYETTE COUNTIES  
(Place-Political Subdivision)

in WESTMORELAND County 64  
(County Code)

on or about 06/21/2015-02/02/2016 AT VARIOUS TIMES  
(Offense Date)





# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-63-19</b>	Date Filed: <b>2/13/19</b>	OTN/LiveScan Number <b>11678194-L</b>	Complaint/Incident Number <b>A01-1969890</b>
Defendant Name	First: <b>REBEKAH</b>	Middle: <b>RENEE</b>	Last: <b>CARWITHEN</b>

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>1</b>	<b>780-113</b>	<b>(a)(12)</b>	<b>of the</b>	<b>Title 35 , C.S.D.D.C.A.</b>	<b>1</b>	<b>F</b>	<b>18( )/35A</b>
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Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance):  
**The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties**

Acts of the accused associated with this Offense:  
 IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT by his/her conduct or conduct of another did knowingly and intentionally acquire or obtain possession of approx. 798 Buprenorphin (Subutex) 8mg pills, a schedule 3 controlled substance, from Multiple area pharmacies by misrepresentation, fraud, forgery, deception or subterfuge, namely, the DEFENDANT and CO-DEFENDANTS caused prescriptions to be telephoned in to pharmacies fraudulently using Dr. Nabil JABBOURS name and DEA #, in violation of Section 780-113(a)(12) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>2</b>	<b>911</b>	<b>(b)(3)</b>	<b>of the</b>	<b>Title 18 , PA Crimes Code</b>	<b>1</b>	<b>F1</b>	<b>/</b>
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Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense:  
 IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(3) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>C2103-19</b>	Date Filed: <b>3/13-19</b>	OTN/LiveScan Number: <b>0678194-6</b>	Complaint/Incident Number <b>A01-1969890</b>
Defendant Name	First: <b>REBEKAH</b>	Middle: <b>RENEEE</b>	Last: <b>CARWITHEN</b>

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	911	(b)(4)	of the	Title 18 , PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):  
**CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense:  
 IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity the DEFENDANT did conspire to violate the provisions of paragraph 3 of this section. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(4) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	4	903	(a)(1)	of the	Title 18 , PA Crimes Code	1	F1		/90Z
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

Acts of the accused associated with this Offense:  
 IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, with the intent of promoting or facilitating the crime of , did conspire and agree with Brooke CROSS, Sabrina THOMAS, Rhonda ANTHONY, Jacqueline KEYS and Adam FINCIK that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of telephoning fraudulent prescriptions into area pharmacies utilizing the identity of Dr. Nabil JABBOUR as well as his DEA number to obtain Buprenorphine (Subutex) by diversion / fraud, in violation of Section 903(a)(1) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: 02-63-19	Date Filed: 2/13/19	OTN/LiveScan Number 18678 194-6	Complaint/Incident Number A01-1969890
Defendant Name	First: REBEKAH	Middle: RENEE	Last: CARWITHEN

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	4101	(a)(2)	of the	Title 18 , PA Crimes Code	1	F3		100/250
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

**Forgery**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did make, complete, execute, authenticate, issue or transfer any writing so that it purports to be the act of who did not authorize the 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, said alteration being, the DEFENDANT caused fraudulent prescriptions to be telephoned/filled/dispensed/picked up and diverted from their intended lawful use utilizing the identifying information of Dr. Nabil JABBOUR including his DEA#, with intent to defraud or injure Dr. Nabil JABBOUR and multiple pharmacies, in violation of Section 4101(a)(2) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	6	4120	(a)	of the	Title 18 , PA Crimes Code	1	F3		110/
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

**Identity Theft**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did possess or use, through any means, identifying information of another person, namely, Dr. Nabil JABBOUR age 64 at the time, without the consent of said person, to further the unlawful purpose of fraudulently obtaining prescriptions by using Dr. JABBOUR'S name, and DEA # to telephone in multiple prescriptions to local pharmacies, in violation of Section 4120(a) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

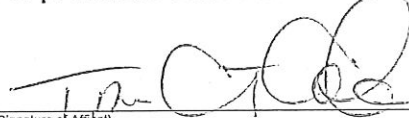
Docket Number: <u>CR-6319</u>	Date Filed: <u>2/13/19</u>	OTN/LiveScan Number <u>0678194-6</u>	Complaint/Incident Number A01-1969890
Defendant Name	First: REBEKAH	Middle: RENEEE	Last: CARWITHEN

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 14
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 than non-confidential information and documents.

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

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


FEBRUARY 13, 2019  
(Date)

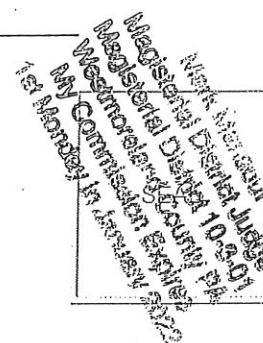
  
(Signature of Affiant)

AND NOW, on this date, FEB 13 2019 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.

10-3-01

(Magisterial District Court Number)

  
(Issuing Authority)







# POLICE CRIMINAL COMPLAINT

Docket Number: CR-63-H	Date Filed: 2/13/19	OTN/LiveScan Number: 0678194-6	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rebekah	Middle: Renee	Last: CARWITHEN

## AFFIDAVIT of PROBABLE CAUSE

I am a sworn member of the Pennsylvania State Police, assigned to the Criminal Investigations Unit at Troop A Greensburg. I have been employed by the Pennsylvania State police since January of 2007. I have been involved in and investigated a multitude of police incidents from property crimes to criminal homicides. The information contained in this affidavit is derived from interviews of involved persons, personal observations and knowledge of this investigation.

On or around December of 2015, I was made aware of a group of individuals who were operating in the Westmoreland and Fayette County areas. This specific group of individuals were causing fraudulent prescriptions to be telephoned in to area pharmacies utilizing Dr. Nabil JABBOUR's identifying information, including his name and Drug Enforcement Administration (DEA) assigned number without his knowledge or consent. JABBOUR's identifying information along with specific information for prescriptions to obtain controlled substances were provided to the pharmacy by individuals within this group. This caused the pharmacy to fill and dispense these fraudulent prescriptions which were then paid for and picked up by individuals within this group. An investigation into this group of individuals resulted in the identification of several of these individuals. These individuals and their actions surrounding these crimes are detailed below.

Sabrina THOMAS was interviewed during this investigation. THOMAS related that she had been employed as the Office Manager for N. JABBOUR. Through her employment prior to becoming office manager, she learned that another known employee had been using JABBOUR's identifying information to obtain fraudulent prescriptions. She decided to start obtaining fraudulent prescriptions herself. While working in her capacity as office manager, she became friendly with a patient named Brooke CROSS. THOMAS and CROSS agreed that THOMAS would use JABBOUR's personal identifying information and DEA number to call in fraudulent prescriptions using CROSS's personal information. THOMAS called in two prescriptions, one for Buprenorphine and one for Gabapentin. CROSS then went and picked up the prescriptions. CROSS kept the Buprenorphine and provided the prescription for Gabapentin to THOMAS. THOMAS is also responsible for calling in other prescriptions in conjunction with CROSS picking them up.

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

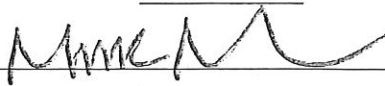
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

  
(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

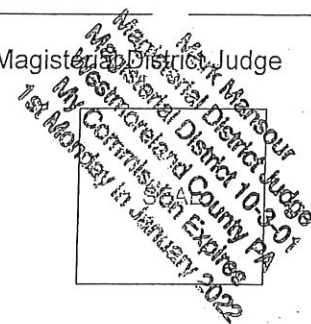
2-13-19

Date



, Magister of District Judge

My commission expires first Monday of January,







POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CR-63-19	Date Filed: 2/13/19	OTN/LiveScan Number: 0678194-6	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rebekah	Middle: Renee	Last: CARWITHEN

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

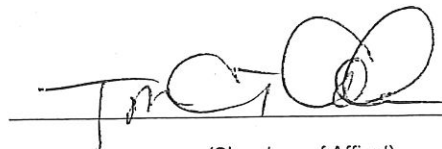
This relationship between THOMAS and CROSS continued. At one point, CROSS was providing other people's names and dates of birth to THOMAS. THOMAS would call in the prescriptions to various local pharmacies and CROSS would pick them up. THOMAS eventually grew tired of making all of the phone calls and provided CROSS with JABBOUR's DEA number and information required for CROSS to call the prescription in herself. CROSS then began to make the phone calls to the pharmacy herself. She knows that CROSS was eventually caught picking up a prescription in New Stanton at a pharmacy. Once this happened, CROSS told her to erase all of her messages and not contact her any longer. THOMAS went on to admit that she had called in prescriptions to the Uniontown, PA Walmart using her boyfriend Ronald KINGAN's name. She also admitted to using her own name and calling in prescriptions with JABBOUR's DEA number.

Brook CROSS was interviewed during this investigation. She indicated that she was once a patient of JABBOUR's. According to CROSS, she started going to Dr. JABBOUR's in Greensburg due to an addiction problem she had with pain pills. She went there for a "detox" program. Since she had insurance, Dr. JABBOUR did a quick detox program for her which did not work. She felt the program was too short and she was not completely "weened" off of the pain pills upon completion of the program. She was approached by Sabrina THOMAS with an offer similar to that described by THOMAS. CROSS allowed THOMAS to use her demographic information and she admitted that she fraudulently obtained the prescriptions described by THOMAS. She also admitted to obtaining a prescription for Gabapentin in her name for THOMAS. She admitted to calling in and picking up multiple of the identified prescriptions in this investigation. She admitted that she called in prescriptions under other individuals names and identifying information while using Dr. JABBOUR's name and DEA #. Phone records confirm that CROSS's phone called area pharmacies on dates and times which correspond to identified fraudulent prescriptions. Video surveillance was also obtained for a majority of the identified fraudulent prescriptions. CROSS is seen on surveillance footage on multiple days picking up fraudulent prescriptions. CROSS identified Jaqueline KEYS as another person who obtained a prescription resulting from this fraud. She told investigators that KEYS also picked up fraudulent prescriptions in her boyfriend Adam FINCIK's name.

I went through photographs from surveillance with CROSS. She cooperated and identified herself and other members of this group in the frames picking up fraudulent prescriptions.

Rebekah CARWITHEN was interviewed as a part of this investigation. Her name was used to obtain fraudulent prescriptions with JABBOUR's DEA #. CARWITHEN was friends with CROSS. CARWITHEN admitted that she was a heroin addict and provided CROSS with her name and identifying information so that she could get suboxone or money so she wouldn't be sick from heroin withdrawal. CROSS told CARWITHEN that she had a friend named Sabrina who worked for a doctor who would take people's names, call in prescriptions. CROSS would pick up the prescription and some type of split would be made between CROSS and THOMAS.

CONTINUED

  
(Signature of Affiant)

MAMM 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CR 13-19	Date Filed: 7/13/19	OTN/LiveScan Number: 116-78194-6	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rebekah	Middle: Renee	Last: CARWITHEN

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

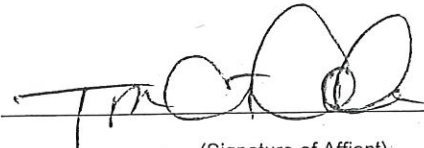
Rhonda ANTHONY was interviewed as a part of this investigation. She admitted that she had been involved with this identified group of individuals who were using Dr. JABBOUR's name and DEA number to obtain fraudulent prescriptions. She was approached by CROSS with this idea as a way to make some extra money. CROSS told her that she had a friend who worked at a doctor's office who could call in prescriptions and that all they would have to do was pick them up. ANTHONY would provide names to CROSS who would then in turn pass the name to her friend who would call in the prescription. She admitted to being a part of this group of individuals and admitted to picking up several fraudulent prescriptions for Buprenorphine. ANTHONY would immediately sell the pills for money or she would give them to her daughter Rebeka CARWITHEN who was a recovering heroin addict. ANTHONY was viewed on surveillance video picking up fraudulent prescriptions. She was identified by a pharmacist at the New Stanton Pharmacy after she was asked to provide her driver's license while picking up a verified fraudulent prescription for Buprenorphine in her mother's name (Shirley ORBIN).

Jaqueline KEYS was interviewed as a result of this investigation. KEYS knows CROSS through a mutual friend. KEYS indicated that her boyfriend Adam FINCIK was in need of a prescription for suboxone as he was taking it without a prescription. CROSS told her that there was a girl that worked at the front of the doctor's office that she knew would get the prescription. She named this girl as "Sabrina". KEYS provided FINCIK's information to CROSS who in turn gave it to THOMAS. THOMAS then called in the prescription using Dr. JABBOUR's name and DEA #. THOMAS called CROSS back and told her where she had called in the prescription. KEYS admitted to picking up this prescription on 07/31/15.

At one-point, CROSS asked KEYS to call Sabrina and act like KEYS was CROSS's sister. CROSS came to KEYS' residence and asked her to call Sabrina and act like her sister to talk her into getting her more prescriptions. She went on to relate that at some point Sabrina apparently became suspicious that CROSS was being watched by the police. She related that she agreed to help CROSS and text/speak with Sabrina from her cell phone. She related that she had told Sabrina that CROSS had gone to Ohio. She related that CROSS did most of the texting and when Sabrina wanted to talk on the phone, KEYS did the talking. KEYS related that she told Sabrina that BROOKE left for Ohio because she was beat up by her boyfriend. This was all in an attempt to get THOMAS to call in more prescriptions. KEYS admitted to picking up at least one prescription for Buprenorphine from a local pharmacy in Adam FINCIK's name. She indicated that her boyfriend Adam FINCIK picked up at least one prescription for Buprenorphine in his own name. Phone records indicate that KEYS and THOMAS had phone contact multiple times. KEYS was identified through video footage as being with CROSS when she picked up a fraudulent prescription in Robert CRAVEN's name. She went on to describe that she was there as a "decoy". The "decoy's" job was to distract CROSS as they went to the pharmacies to pick up these fraudulent prescriptions since CROSS was extremely nervous. She had nothing further to relate.

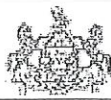
Adam FINCIK was interviewed as a part of this investigation. He related that KEYS is his girlfriend and that they have children together. He admitted to picking up a fraudulent prescription in his name. He also admitted that he never went to a doctor to get this prescription, he did not pay a co-payment, nor did he undergo a urine test to receive this prescription. He knew that he would need to see a doctor, undergo a urine drug test to have a prescription for suboxone filled. He knew this because he had previously been to another doctor to obtain this exact prescription.

CONTINUED

  
(Signature of Affiant)

 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: 012-63-19	Date Filed: 2/13/19	OTN/LiveScan Number: 11678194-6	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rebekah	Middle: Renee	Last: CARWITHEN

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Dr. Nabil JABBOUR was interviewed and indicated that the only person out of those mentioned above who has ever been a patient of his was CROSS. She was only a patient for a short period of time. He did not authorize the calling in of any prescriptions for CROSS other than the ones linked to her care. He also has never called in or authorized to be called in prescriptions for CARWITHEN, CROSS, ANTHONY, KEYES, FINCIK or any of the other names used and identified on the prescriptions that this group was using JABBOUR's information to have filled. JABBOUR indicated that the prescriptions were not issued by him and not issued pursuant to his employment as a medical doctor. He did not authorize the use of his name, identifying information or DEA for these purposes

The additional known fraudulent prescriptions listed below were called in and obtained using Dr. Nabil JABBOUR's name, identifying information and DEA #.

On 06/21/15, a telephoned prescription was received at the Medicine Shoppe in Greensburg, PA in the name Brooke CROSS for Gabapentin 800mg, 120 count. This prescription was picked up by CROSS.

On 07/22/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled. Twenty of the pills were picked up on 07/22/15. Eight of the pills were picked up on 07/23/15. Two of the pills were picked up on 07/24/15. Seven of the pills were picked up on 07/25/15. Three of the pills were picked up on 07/26/15. The remaining two pills were picked up on 07/27/15. Brooke CROSS picked up the pills on each of these dates.

On 07/31/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15 by Jaqueline KEYS.

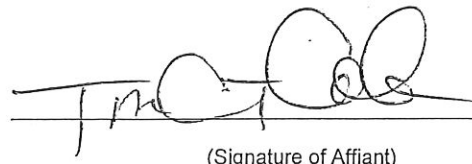
On 08/05/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/05/15 by CROSS.

On 08/17/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15. By his admission, FINCIK picked up this prescription.

On 08/21/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/21/15 by CROSS.

On 08/26/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/26/15, this prescription was picked up Brooke CROSS.

CONTINUED

  
(Signature of Affiant)

MMK 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: 02-63-19	Date Filed: 2/13/19	OTN/LiveScan Number: 0628194-6	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rebekah	Middle: Renee	Last: CARWITHEN

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 09/04/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/04/15 by Brooke CROSS.

On 09/08/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/08/15 by CROSS.

On 09/16/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert J. CRAVEN, for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/16/15 by Rhonda ANTHONY.

On 09/18/15 a telephoned prescription was received at Greensburg Wal Mart under the name Becca CARWITHEN, for Buprenorphine (Subutex) 8mg, 42. This prescription was filled and was picked up on 09/18/15 by Brooke CROSS.

On 09/28/15, a telephoned prescription was received at Greensburg Wal Mart under the name Shirley ORBIN, for Buprenorphine (Subutex) 8mg 42 count. This prescription was filled and was picked up on 09/28/15 by Brooke CROSS and Rhonda ANTHONY.

On 09/30/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/30/15 by CROSS.

On 10/02/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/02/15 by CROSS and Rhonda ANTHONY.

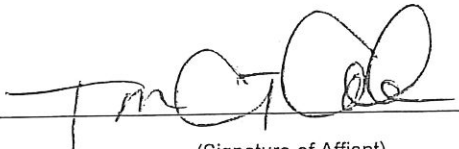
On 10/06/15, a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN, for Buprenorphine (Subutex) 8mg 42 count, and Clonidine .1mg 30 count. This prescription was filled and was picked up on 10/06/15 by unidentified white male who arrived and left with Brooke CROSS.

On 10/12/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/12/15 by Brooke CROSS.

On 10/16/15, a telephone prescription was received at the North Huntingdon Walmart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/16/15 by Brooke CROSS and Rhonda ANTHONY.

On 10/21/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/21/15 by CROSS and Rhonda ANTHONY.

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(Signature of Affiant)

 2-13-19



POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: 012-2819	Date Filed: 07/18/19	OTN/LiveScan Number: 01678199-L	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rebekah	Middle: Renee	Last: CARWITHEN

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 10/26/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/26/15 by CROSS and Rhonda ANTHONY.

On 11/06/15, a telephone prescription was received at the New Stanton Pharmacy under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was not filled. Rhonda Anthony and Brook CROSS attempted to pick this prescription up and were identified as a result.

On 12/23/15, a telephone prescription was received at the Uniontown Walmart under the name Ronald KINGAN for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 12/23/15 by KINGAN, who was THOMAS's boyfriend.

On 02/02/16, a telephone prescription was received at the Uniontown Walmart under the name Sabrina THOMAS for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 02/02/16 by KINGAN, who was THOMAS's boyfriend.

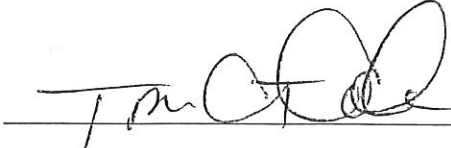
The involved pharmacies are located at the following addresses.

- Walmart North Huntingdon Pharmacy: 915 Mills Dr. N. Huntingdon, PA 15642
- Walmart Greensburg Pharmacy: 2200 Greengate Center Greensburg, PA 15601
- Walmart Belle Vernon Pharmacy: 100 Sara Way Belle Vernon, PA 15012
- Walmart Uniontown Pharmacy: 355 Walmart Dr. Uniontown, PA 15401
- Medicine Shoppe Greensburg: 434 E. Pittsburgh St. Greensburg, PA 15425
- New Stanton Pharmacy 144 Post Ave. New Stanton, PA 15672

Gabapentin is an unscheduled drug available only by prescription. Clonidine is an unscheduled drug available only by prescription. Buprenorphine (Subutex) is a DEA schedule 3 controlled substance.

The individuals who conspired as a part of this organization are responsible for the illegal diversion of at least 798 documented doses of Buprenorphine (Subutex) (Schedule 3) 8mg pills.

I respectfully request that a warrant of arrest be issued for the above listed defendant, so they may answer to the charges as set forth in this Criminal Complaint/Affidavit of Probable Cause.

  
(Signature of Affiant)

 2-13-19



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: WESTMORELANDPOLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 10-3-01  
MDJ Name: Hon. MARK MANSOUR  
Address: 174 SOUTH GREENGATE RD.  
GREENSBURG, PA 15601  
Telephone: 724-836-1010

DEFENDANT: (NAME and ADDRESS):  
SABRINA DEE THOMAS  
First Name Middle Name Last Name Gen.  
575 FILBERT ORIENT RD  
FAIRBANK, PA 15435  
724-580-7557

## NCIC EXTRADITION CODE TYPE

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

## DEFENDANT IDENTIFICATION INFORMATION

Docket Number 02-64-19 Date Filed 5-13-19 OTN/LiveScan Number U678195-0 Complaint/Incident Number A01-1969890 Request Lab Services? ☐ YES ☒ NO

GENDER ☐ Male ☒ Female DOB 04/30/91 POB PENNSYLVANIA Add'l DOB Co-Defendant(s) ☐  
AKA First Name: Middle Name: Last Name: Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.) 150

FBI Number 126916CE7 MNU Number Ft. HEIGHT In.

Defendant Fingerprinted ☐ YES ☒ NO 5 4

Fingerprint Classification:

## DEFENDANT VEHICLE INFORMATION

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

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because: \_\_\_\_\_  
(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CHRISTOPHER COLE

00638746/10564

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

of the Pennsylvania State Police, Troop A, Greensburg  
(Identify Department or Agency Represented and Political Subdivision)

PAPSP3400  
(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 is 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: 209 MULTIPLE PHARMACIES LOCATED WITHIN  
(Subdivision Code) WESTMORELAND AND FAYETTE COUNTIES  
(Place-Political Subdivision)

in WESTMORELAND County 64  
(County Code)

on or about 06/21/2015-02/02/2016 AT VARIOUS TIMES  
(Offense Date)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR 64-19</b>	Date Filed: <b>7/13/19</b>	OTN/LiveScan Number <b>0678195-6</b>	Complaint/Incident Number A01-1969890
Defendant Name	First: SABRINA	Middle: DEE	Last: THOMAS

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	1	780-113	(a)(12)	of the	Title 35 , C.S.D.D.C.A.	1	F		18( )/35A
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

## The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT by his/her conduct or conduct of another did knowingly and intentionally acquire or obtain possession of approx. 798 Buprenorphin (Subutex) 8mg pills, a schedule 3 controlled substance, from Multiple area pharmacies by misrepresentation, fraud, forgery, deception or subterfuge, namely, the DEFENDANT and CO-DEFENDANTS caused prescriptions to be telephoned in to pharmacies fraudulently using Dr. Nabil JABBOURS name and DEA #, in violation of Section 780-113(a)(12) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	911	(b)(3)	of the	Title 18 , PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(3) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: <b>02-64-19</b>	Date Filed: <b>02-13-19</b>	OTN/LiveScan Number <b>U678195-0</b>	Complaint/Incident Number <b>A01-1969890</b>
Defendant Name	First: <b>SABRINA</b>	Middle: <b>DEE</b>	Last: <b>THOMAS</b>

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	911	(b)(4)	of the	Title 18 , PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity the DEFENDANT did conspire to violate the provisions of paragraph 3 of this section. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(4) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	4	903	(a)(1)	of the	Title 18 , PA Crimes Code	1	F1		/90Z
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## Criminal Conspiracy

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, with the intent of promoting or facilitating the crime of , did conspire and agree with Rebekah CARWITHEN, Brooke CROSS, Rhonda ANTHONY, Jacqueline KEYS and Adam FINCIK that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of telephoning fraudulent prescriptions into area pharmacies utilizing the identity of Dr. Nabil JABBOUR as well as his DEA number to obtain Buprenorphine (Subutex) by diversion / fraud, in violation of Section 903(a)(1) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CP-44-19</b>	Date Filed: <b>2-13-19</b>	OTN/LiveScan Number <b>U0781950</b>	Complaint/Incident Number <b>A01-1969890</b>
Defendant Name	First: <b>SABRINA</b>	Middle: <b>DEE</b>	Last: <b>THOMAS</b>

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>5</b>	<b>4101</b>	<b>(a)(2)</b>	of the	<b>Title 18 , PA Crimes Code</b>	<b>1</b>	<b>F3</b>		<b>100/250</b>
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	-------------------------------------	--------------------------------------	------------------------------------

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

## Forgery

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did make, complete, execute, authenticate, issue or tranfer any writing so that it purports to be the act of who did not authorize the 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, said alteration being, the DEFENDANT caused fraudulent prscriptions to be telephoned/filled/dispensed/picked up and diverted from their intended lawful use utilizing the identifying information of Dr. Nabil JABBOUR including his DEA#, with intent to defraud or injure Dr. Nabil JABBOUR and multiple pharmacies, in violation of Section 4101(a)(2) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
---------------------	--	---	---	--------------------------------------

<input type="checkbox"/> Lead?	<b>6</b>	<b>4120</b>	<b>(a)</b>	of the	<b>Title 18 , PA Crimes Code</b>	<b>1</b>	<b>F3</b>		<b>110/</b>
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	-------------------------------------	--------------------------------------	------------------------------------

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

## Identity Theft

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did possess or use, through any means, identifying information of another person, namely, Dr. Nabil JABBOUR age 64 at the time, without the consent of said person, to further the unlawful purpose of fraudulently obtaining prescriptions by using Dr. JABBOURS name, and DEA # to telephone in multiple prescriptions to local pharmacies, in violation of Section 4120(a) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT


Docket Number: <u>02-64-19</u>	Date Filed: <u>3-13-19</u>	OTN/LiveScan Number <u>0678195-0</u>	Complaint/Incident Number A01-1969890
Defendant Name	First: SABRINA	Middle: DEE	Last: THOMAS

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 14
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

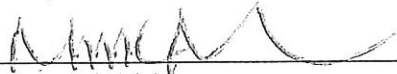
FEBRUARY 13, 2019  
(Date)

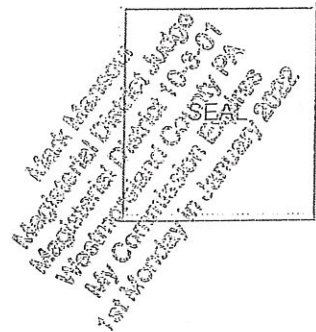
  
(Signature of Affiant)

AND NOW, on this date, FEB 13 2019 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.

10-3-01

(Magisterial District Court Number)

  
(Issuing Authority)





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Sabrina	Middle: Dee	Last: THOMAS

## AFFIDAVIT of PROBABLE CAUSE

I am a sworn member of the Pennsylvania State Police, assigned to the Criminal Investigations Unit at Troop A Greensburg. I have been employed by the Pennsylvania State police since January of 2007. I have been involved in and investigated a multitude of police incidents from property crimes to criminal homicides. The information contained in this affidavit is derived from interviews of involved persons, personal observations and knowledge of this investigation.

On or around December of 2015, I was made aware of a group of individuals who were operating in the Westmoreland and Fayette County areas. This specific group of individuals were causing fraudulent prescriptions to be telephoned in to area pharmacies utilizing Dr. Nabil JABBOUR's identifying information, including his name and Drug Enforcement Administration (DEA) assigned number without his knowledge or consent. JABBOUR's identifying information along with specific information for prescriptions to obtain controlled substances were provided to the pharmacy by individuals within this group. This caused the pharmacy to fill and dispense these fraudulent prescriptions which were then paid for and picked up by individuals within this group. An investigation into this group of individuals resulted in the identification of several of these individuals. These individuals and their actions surrounding these crimes are detailed below.


Sabrina THOMAS was interviewed during this investigation. THOMAS related that she had been employed as the Office Manager for N. JABBOUR. Through her employment prior to becoming office manager, she learned that another known employee had been using JABBOUR's identifying information to obtain fraudulent prescriptions. She decided to start obtaining fraudulent prescriptions herself. While working in her capacity as office manager, she became friendly with a patient named Brooke CROSS. THOMAS and CROSS agreed that THOMAS would use JABBOUR's personal identifying information and DEA number to call in fraudulent prescriptions using CROSS's personal information. THOMAS called in two prescriptions, one for Buprenorphine and one for Gabapentin. CROSS then went and picked up the prescriptions. CROSS kept the Buprenorphine and provided the prescription for Gabapentin to THOMAS. THOMAS is also responsible for calling in other prescriptions in conjunction with CROSS picking them up.

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

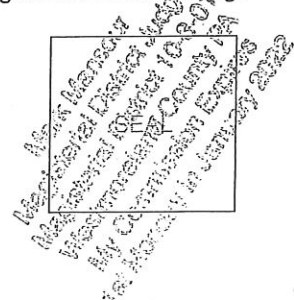
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

  
(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

2-13-19 Date  \_\_\_\_\_, Magisterial District Judge

My commission expires first Monday of January,







POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Sabrina	Middle: Dee	Last: THOMAS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

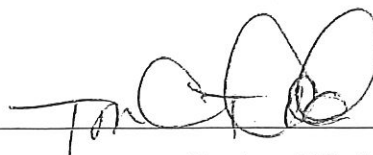
This relationship between THOMAS and CROSS continued. At one point, CROSS was providing other people's names and dates of birth to THOMAS. THOMAS would call in the prescriptions to various local pharmacies and CROSS would pick them up. THOMAS eventually grew tired of making all of the phone calls and provided CROSS with JABBOUR's DEA number and information required for CROSS to call the prescription in herself. CROSS then began to make the phone calls to the pharmacy herself. She knows that CROSS was eventually caught picking up a prescription in New Stanton at a pharmacy. Once this happened, CROSS told her to erase all of her messages and not contact her any longer. THOMAS went on to admit that she had called in prescriptions to the Uniontown, PA Walmart using her boyfriend Ronald KINGAN's name. She also admitted to using her own name and calling in prescriptions with JABBOUR's DEA number.

Brook CROSS was interviewed during this investigation. She indicated that she was once a patient of JABBOUR's. According to CROSS, she started going to Dr. JABBOUR's in Greensburg due to an addiction problem she had with pain pills. She went there for a "detox" program. Since she had insurance, Dr. JABBOUR did a quick detox program for her which did not work. She felt the program was too short and she was not completely "weened" off of the pain pills upon completion of the program. She was approached by Sabrina THOMAS with an offer similar to that described by THOMAS. CROSS allowed THOMAS to use her demographic information and she admitted that she fraudulently obtained the prescriptions described by THOMAS. She also admitted to obtaining a prescription for Gabapentin in her name for THOMAS. She admitted to calling in and picking up multiple of the identified prescriptions in this investigation. She admitted that she called in prescriptions under other individuals names and identifying information while using Dr. JABBOUR's name and DEA #. Phone records confirm that CROSS's phone called area pharmacies on dates and times which correspond to identified fraudulent prescriptions. Video surveillance was also obtained for a majority of the identified fraudulent prescriptions. CROSS is seen on surveillance footage on multiple days picking up fraudulent prescriptions. CROSS identified Jaqueline KEYS as another person who obtained a prescription resulting from this fraud. She told investigators that KEYS also picked up fraudulent prescriptions in her boyfriend Adam FINCIK's name.

I went through photographs from surveillance with CROSS. She cooperated and identified herself and other members of this group in the frames picking up fraudulent prescriptions.

Rebekah CARWITHEN was interviewed as a part of this investigation. Her name was used to obtain fraudulent prescriptions with JABBOUR's DEA #. CARWITHEN was friends with CROSS. CARWITHEN admitted that she was a heroin addict and provided CROSS with her name and identifying information so that she could get suboxone or money so she wouldn't be sick from heroin withdrawal. CROSS told CARWITHEN that she had a friend named Sabrina who worked for a doctor who would take people's names, call in prescriptions. CROSS would pick up the prescription and some type of split would be made between CROSS and THOMAS.

CONTINUED

  
(Signature of Affiant)

 2-13-19

Mark Mansur  
Allegheny County District Attorney  
Allegheny County, PA  
For the Court in January











POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Sabrina	Middle: Dee	Last: THOMAS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 09/04/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/04/15 by Brooke CROSS.

On 09/08/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/08/15 by CROSS.

On 09/16/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert J. CRAVEN, for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/16/15 by Rhonda ANTHONY.

On 09/18/15 a telephoned prescription was received at Greensburg Wal Mart under the name Becca CARWITHEN, for Buprenorphine (Subutex) 8mg, 42. This prescription was filled and was picked up on 09/18/15 by Brooke CROSS.

On 09/28/15, a telephoned prescription was received at Greensburg Wal Mart under the name Shirley ORBIN, for Buprenorphine (Subutex) 8mg 42 count. This prescription was filled and was picked up on 09/28/15 by Brooke CROSS and Rhonda ANTHONY.

On 09/30/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/30/15 by CROSS.

On 10/02/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/02/15 by CROSS and Rhonda ANTHONY.



On 10/06/15, a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN, for Buprenorphine (Subutex) 8mg 42 count, and Clonidine .1mg 30 count. This prescription was filled and was picked up on 10/06/15 by unidentified white male who arrived and left with Brooke CROSS.

On 10/12/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/12/15 by Brooke CROSS.

On 10/16/15, a telephone prescription was received at the North Huntingdon Walmart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/16/15 by Brooke CROSS and Rhonda ANTHONY.

On 10/21/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/21/15 by CROSS and Rhonda ANTHONY.

CONTINUED

  
(Signature of Affiant)  
  
2-13-19  
Notary Public for the Commonwealth of Massachusetts  
My Commission Expires January 2022





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Sabrina	Middle: Dee	Last: THOMAS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 10/26/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/26/15 by CROSS and Rhonda ANTHONY.

On 11/06/15, a telephone prescription was received at the New Stanton Pharmacy under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was not filled. Rhonda Anthony and Brook CROSS attempted to pick this prescription up and were identified as a result.

On 12/23/15, a telephone prescription was received at the Uniontown Walmart under the name Ronald KINGAN for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 12/23/15 by KINGAN, who was THOMAS's boyfriend.

On 02/02/16, a telephone prescription was received at the Uniontown Walmart under the name Sabrina THOMAS for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 02/02/16 by KINGAN, who was THOMAS's boyfriend.

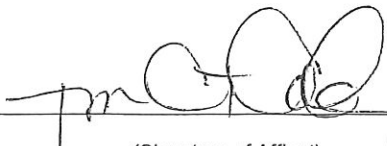
The involved pharmacies are located at the following addresses.

- Walmart North Huntingdon Pharmacy: 915 Mills Dr. N. Huntingdon, PA 15642
- Walmart Greensburg Pharmacy: 2200 Greengate Center Greensburg, PA 15601
- Walmart Belle Vernon Pharmacy: 100 Sara Way Belle Vernon, PA 15012
- Walmart Uniontown Pharmacy: 355 Walmart Dr. Uniontown, PA 15401
- Medicine Shoppe Greensburg: 434 E. Pittsburgh St. Greensburg, PA 15425
- New Stanton Pharmacy 144 Post Ave. New Stanton, PA 15672

Gabapentin is an unscheduled drug available only by prescription. Clonidine is an unscheduled drug available only by prescription. Buprenorphine (Subutex) is a DEA schedule 3 controlled substance.

The individuals who conspired as a part of this organization are responsible for the illegal diversion of at least 798 documented doses of Buprenorphine (Subutex) (Schedule 3) 8mg pills.

I respectfully request that a warrant of arrest be issued for the above listed defendant, so they may answer to the charges as set forth in this Criminal Complaint/Affidavit of Probable Cause.

  
(Signature of Affiant)



2-18-16  
My Commission Expires 12-31-16  
For More Information Call 724-862-2222

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: WESTMORELAND



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 10-3-01  
MDJ Name: Hon. MARK MANSOUR  
Address: 174 SOUTH GREENGATE RD.  
GREENSBURG, PA 15601  
Telephone: 724-836-1010

DEFENDANT: (NAME and ADDRESS):  
JACQUELINE REBBA KEYS  
First Name Middle Name Last Name Gen.  
238 N. 2<sup>ND</sup> ST.  
WEST NEWTON, PA 15089  
724-610-3520

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-62-19 Date Filed 12-13-19 OTN/LiveScan Number U678193-5 Complaint/Incident Number A01-1969890 Request Lab Services? ☐ YES ☒ NO

GENDER ☐ Male ☒ Female DOB 02/03/86 POB PENNSYLVANIA Add'l DOB Co-Defendant(s) ☐  
First Name: Middle Name: Last Name: Gen.  
AKA

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.) 120

FBI Number 365407MC5 MNU Number Ft. HEIGHT In.

Defendant Fingerprinted ☐ YES ☒ NO 5 2

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

VIN Year Make Model Style Color

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because: \_  
(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CHRISTOPHER COLE

00638746/10564

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

of the Pennsylvania State Police, Troop A, Greensburg  
(Identify Department or Agency Represented and Political Subdivision)

PAPSP3400

(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 is 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:

209

(Subdivision Code)

MULTIPLE PHARMACIES LOCATED WITHIN  
WESTMORELAND AND FAYETTE COUNTIES  
(Place/Political Subdivision)

in WESTMORELAND County

64

(County Code)

on or about 06/21/2015-02/02/2016 AT VARIOUS TIMES

(Offense Date)





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number A01-1969890
Defendant Name	First: JACQUELINE	Middle: REBBA	Last: KEYS

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	1	780-113	(a)(12)	of the	Title 35 , C.S.D.D.C.A.	1	F		18( )/35A
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

**The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT by his/her conduct or conduct of another did knowingly and intentionally acquire or obtain possession of approx. 798 Buprenorphin (Subutex) 8mg pills, a schedule 3 controlled substance, from Multiple area pharmacies by misrepresentation, fraud, forgery, deception or subterfuge, namely, the DEFENDANT and CO-DEFENDANTS caused prescriptions to be telephoned in to pharmacies fraudulently using Dr. Nabil JABBOURS name and DEA #, in violation of Section 780-113(a)(12) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	911	(b)(3)	of the	Title 18 , PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

**CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(3) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number A01-1969890
Defendant Name	First: JACQUELINE	Middle: REBBA	Last: KEYS

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	911	(b)(4)	of the	Title 18 , PA Crimes Code	1	F1	/
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity the DEFENDANT did conspire to violate the provisions of paragraph 3 of this section. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(4) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	4	903	(a)(1)	of the	Title 18 , PA Crimes Code	1	F1	/90Z
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

## Criminal Conspiracy

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, with the intent of promoting or facilitating the crime of , did conspire and agree with Rebekak CARWITHEN, Sabrina THOMAS, Rhonda ANTHONY, Brook CROSS and Adam FINCIK that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of telephoning fraudulent prescriptions into area pharmacies utilizing the identity of Dr. Nabil JABBOUR as well as his DEA number to obtain Buprenorphine (Subutex) by diversion / fraud, in violation of Section 903(a)(1) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number A01-1969890
Defendant Name	First: JACQUELINE	Middle: REBBA	Last: KEYS

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
---------------------	--	---	---	--------------------------------------

<input type="checkbox"/> Lead?	5	4101	(a)(2)	of the	Title 18 , PA Crimes Code	1	F3		100/250
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	-------------------------------------	--------------------------------------	------------------------------------

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

## Forgery

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did make, complete, execute, authenticate, issue or tranfer any writing so that it purports to be the act of who did not authorize the 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, said alteration being, the DEFENDANT caused fraudulent prscriptions to be telephoned/filled/dispensed/picked up and diverted from their intended lawful use utilizing the identifying information of Dr. Nabil JABBOUR including his DEA#, with intent to defraud or injure Dr. Nabil JABBOUR and multiple pharmacies, in violation of Section 4101(a)(2) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
---------------------	--	---	---	--------------------------------------

<input type="checkbox"/> Lead?	6	4120	(a)	of the	Title 18 , PA Crimes Code	1	F3		110/
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	-------------------------------------	--------------------------------------	------------------------------------

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

## Identity Theft

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did possess or use, through any means, identifying information of another person, namely, Dr. Nabil JABBOUR age 64 at the time, without the consent of said person, to further the unlawful purpose of fraudulently obtaining prescriptions by using Dr. JABBOURS name, and DEA # to telephone in multiple prescriptions to local pharmacies, in violation of Section 4120(a) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

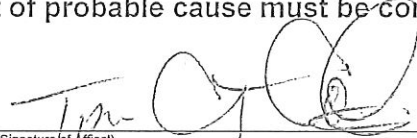
Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number A01-1969890
Defendant Name	First: JACQUELINE	Middle: REBBA	Last: KEYS

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 14
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

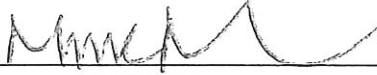
FEBRUARY 13, 2019  
(Date)

  
(Signature of Affiant)

AND NOW, on this date, 2-13-19 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.

10301

(Magisterial District Court Number)

  
(Issuing Authority)

Mark Manour  
Magisterial District Judge  
Westmoreland County PA  
City Commission Expires  
1st Monday in January 2022





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Jacqueline	Middle: Rebba	Last: KEYS

## AFFIDAVIT of PROBABLE CAUSE

I am a sworn member of the Pennsylvania State Police, assigned to the Criminal Investigations Unit at Troop A Greensburg. I have been employed by the Pennsylvania State police since January of 2007. I have been involved in and investigated a multitude of police incidents from property crimes to criminal homicides. The information contained in this affidavit is derived from interviews of involved persons, personal observations and knowledge of this investigation.

On or around December of 2015, I was made aware of a group of individuals who were operating in the Westmoreland and Fayette County areas. This specific group of individuals were causing fraudulent prescriptions to be telephoned in to area pharmacies utilizing Dr. Nabil JABBOUR's identifying information, including his name and Drug Enforcement Administration (DEA) assigned number without his knowledge or consent. JABBOUR's identifying information along with specific information for prescriptions to obtain controlled substances were provided to the pharmacy by individuals within this group. This caused the pharmacy to fill and dispense these fraudulent prescriptions which were then paid for and picked up by individuals within this group. An investigation into this group of individuals resulted in the identification of several of these individuals. These individuals and their actions surrounding these crimes are detailed below.


Sabrina THOMAS was interviewed during this investigation. THOMAS related that she had been employed as the Office Manager for N. JABBOUR. Through her employment prior to becoming office manager, she learned that another known employee had been using JABBOUR's identifying information to obtain fraudulent prescriptions. She decided to start obtaining fraudulent prescriptions herself. While working in her capacity as office manager, she became friendly with a patient named Brooke CROSS. THOMAS and CROSS agreed that THOMAS would use JABBOUR's personal identifying information and DEA number to call in fraudulent prescriptions using CROSS's personal information. THOMAS called in two prescriptions, one for Buprenorphine and one for Gabapentin. CROSS then went and picked up the prescriptions. CROSS kept the Buprenorphine and provided the prescription for Gabapentin to THOMAS. THOMAS is also responsible for calling in other prescriptions in conjunction with CROSS picking them up.

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

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

  
(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

2-13-19 Date 

My commission expires first Monday of January,

Magistrate District Judge

Magistrate District Judge  
Westmoreland County PA  
My Commission Expires  
1st Monday in January 2022



POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Jacqueline	Middle: Rebba	Last: KEYS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

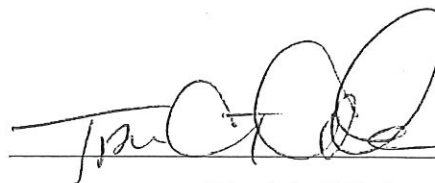
This relationship between THOMAS and CROSS continued. At one point, CROSS was providing other people's names and dates of birth to THOMAS. THOMAS would call in the prescriptions to various local pharmacies and CROSS would pick them up. THOMAS eventually grew tired of making all of the phone calls and provided CROSS with JABBOUR's DEA number and information required for CROSS to call the prescription in herself. CROSS then began to make the phone calls to the pharmacy herself. She knows that CROSS was eventually caught picking up a prescription in New Stanton at a pharmacy. Once this happened, CROSS told her to erase all of her messages and not contact her any longer. THOMAS went on to admit that she had called in prescriptions to the Uniontown, PA Walmart using her boyfriend Ronald KINGAN's name. She also admitted to using her own name and calling in prescriptions with JABBOUR's DEA number.

Brook CROSS was interviewed during this investigation. She indicated that she was once a patient of JABBOUR's. According to CROSS, she started going to Dr. JABBOUR's in Greensburg due to an addiction problem she had with pain pills. She went there for a "detox" program. Since she had insurance, Dr. JABBOUR did a quick detox program for her which did not work. She felt the program was too short and she was not completely "weened" off of the pain pills upon completion of the program. She was approached by Sabrina THOMAS with an offer similar to that described by THOMAS. CROSS allowed THOMAS to use her demographic information and she admitted that she fraudulently obtained the prescriptions described by THOMAS. She also admitted to obtaining a prescription for Gabapentin in her name for THOMAS. She admitted to calling in and picking up multiple of the identified prescriptions in this investigation. She admitted that she called in prescriptions under other individuals names and identifying information while using Dr. JABBOUR's name and DEA #. Phone records confirm that CROSS's phone called area pharmacies on dates and times which correspond to identified fraudulent prescriptions. Video surveillance was also obtained for a majority of the identified fraudulent prescriptions. CROSS is seen on surveillance footage on multiple days picking up fraudulent prescriptions. CROSS identified Jaqueline KEYS as another person who obtained a prescription resulting from this fraud. She told investigators that KEYS also picked up fraudulent prescriptions in her boyfriend Adam FINCIK's name.

I went through photographs from surveillance with CROSS. She cooperated and identified herself and other members of this group in the frames picking up fraudulent prescriptions.

Rebekah CARWITHEN was interviewed as a part of this investigation. Her name was used to obtain fraudulent prescriptions with JABBOUR's DEA #. CARWITHEN was friends with CROSS. CARWITHEN admitted that she was a heroin addict and provided CROSS with her name and identifying information so that she could get suboxone or money so she wouldn't be sick from heroin withdrawal. CROSS told CARWITHEN that she had a friend named Sabrina who worked for a doctor who would take people's names, call in prescriptions. CROSS would pick up the prescription and some type of split would be made between CROSS and THOMAS.

CONTINUED



(Signature of Affiant)

MMK 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Jacqueline	Middle: Rebba	Last: KEYS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

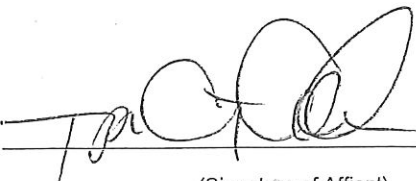
Rhonda ANTHONY was interviewed as a part of this investigation. She admitted that she had been involved with this identified group of individuals who were using Dr. JABBOUR's name and DEA number to obtain fraudulent prescriptions. She was approached by CROSS with this idea as a way to make some extra money. CROSS told her that she had a friend who worked at a doctor's office who could call in prescriptions and that all they would have to do was pick them up. ANTHONY would provide names to CROSS who would then in turn pass the name to her friend who would call in the prescription. She admitted to being a part of this group of individuals and admitted to picking up several fraudulent prescriptions for Buprenorphine. ANTHONY would immediately sell the pills for money or she would give them to her daughter Rebeka CARWITHEN who was a recovering heroin addict. ANTHONY was viewed on surveillance video picking up fraudulent prescriptions. She was identified by a pharmacist at the New Stanton Pharmacy after she was asked to provide her driver's license while picking up a verified fraudulent prescription for Buprenorphine in her mother's name (Shirley ORBIN).

Jaqueline KEYS was interviewed as a result of this investigation. KEYS knows CROSS through a mutual friend. KEYS indicated that her boyfriend Adam FINCIK was in need of a prescription for suboxone as he was taking it without a prescription. CROSS told her that there was a girl that worked at the front of the doctor's office that she knew would get the prescription. She named this girl as "Sabrina". KEYS provided FINCIK's information to CROSS who in turn gave it to THOMAS. THOMAS then called in the prescription using Dr. JABBOUR's name and DEA #. THOMAS called CROSS back and told her where she had called in the prescription. KEYS admitted to picking up this prescription on 07/31/15.

At one-point, CROSS asked KEYS to call Sabrina and act like KEYS was CROSS's sister. CROSS came to KEYS' residence and asked her to call Sabrina and act like her sister to talk her into getting her more prescriptions. She went on to relate that at some point Sabrina apparently became suspicious that CROSS was being watched by the police. She related that she agreed to help CROSS and text/speak with Sabrina from her cell phone. She related that she had told Sabrina that CROSS had gone to Ohio. She related that CROSS did most of the texting and when Sabrina wanted to talk on the phone, KEYS did the talking. KEYS related that she told Sabrina that BROOKE left for Ohio because she was beat up by her boyfriend. This was all in an attempt to get THOMAS to call in more prescriptions. KEYS admitted to picking up at least one prescription for Buprenorphine from a local pharmacy in Adam FINCIK's name. She indicated that her boyfriend Adam FINCIK picked up at least one prescription for Buprenorphine in his own name. Phone records indicate that KEYS and THOMAS had phone contact multiple times. KEYS was identified through video footage as being with CROSS when she picked up a fraudulent prescription in Robert CRAVEN's name. She went on to describe that she was there as a "decoy". The "decoy's" job was to distract CROSS as they went to the pharmacies to pick up these fraudulent prescriptions since CROSS was extremely nervous. She had nothing further to relate.

Adam FINCIK was interviewed as a part of this investigation. He related that KEYS is his girlfriend and that they have children together. He admitted to picking up a fraudulent prescription in his name. He also admitted that he never went to a doctor to get this prescription, he did not pay a co-payment, nor did he undergo a urine test to receive this prescription. He knew that he would need to see a doctor, undergo a urine drug test to have a prescription for suboxone filled. He knew this because he had previously been to another doctor to obtain this exact prescription.

CONTINUED

  
(Signature of Affiant)







POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Jacqueline	Middle: Rebba	Last: KEYS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Dr. Nabil JABBOUR was interviewed and indicated that the only person out of those mentioned above who has ever been a patient of his was CROSS. She was only a patient for a short period of time. He did not authorize the calling in of any prescriptions for CROSS other than the ones linked to her care. He also has never called in or authorized to be called in prescriptions for CARWITHEN, CROSS, ANTHONY, KEYES, FINCIK or any of the other names used and identified on the prescriptions that this group was using JABBOUR's information to have filled. JABBOUR indicated that the prescriptions were not issued by him and not issued pursuant to his employment as a medical doctor. He did not authorize the use of his name, identifying information or DEA for these purposes

The additional known fraudulent prescriptions listed below were called in and obtained using Dr. Nabil JABBOUR's name, identifying information and DEA #.

On 06/21/15, a telephoned prescription was received at the Medicine Shoppe in Greensburg, PA in the name Brooke CROSS for Gabapentin 800mg, 120 count. This prescription was picked up by CROSS.

On 07/22/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled. Twenty of the pills were picked up on 07/22/15. Eight of the pills were picked up on 07/23/15. Two of the pills were picked up on 07/24/15. Seven of the pills were picked up on 07/25/15. Three of the pills were picked up on 07/26/15. The remaining two pills were picked up on 07/27/15. Brooke CROSS picked up the pills on each of these dates.

On 07/31/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15 by Jacqueline KEYS.

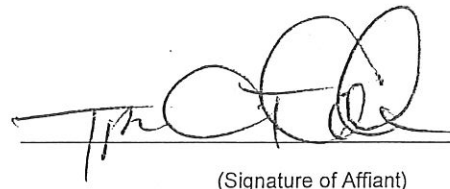
On 08/05/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/05/15 by CROSS.

On 08/17/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15. By his admission, FINCIK picked up this prescription.

On 08/21/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/21/15 by CROSS.

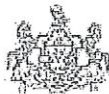
On 08/26/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/26/15, this prescription was picked up Brooke CROSS.

CONTINUED

  
(Signature of Affiant)

Mmmmm 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Jacqueline	Middle: Rebba	Last: KEYS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 09/04/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/04/15 by Brooke CROSS.

On 09/08/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/08/15 by CROSS.

On 09/16/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert J. CRAVEN, for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/16/15 by Rhonda ANTHONY.

On 09/18/15 a telephoned prescription was received at Greensburg Wal Mart under the name Becca CARWITHEN, for Buprenorphine (Subutex) 8mg, 42. This prescription was filled and was picked up on 09/18/15 by Brooke CROSS.

On 09/28/15, a telephoned prescription was received at Greensburg Wal Mart under the name Shirley ORBIN, for Buprenorphine (Subutex) 8mg 42 count. This prescription was filled and was picked up on 09/28/15 by Brooke CROSS and Rhonda ANTHONY.

On 09/30/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/30/15 by CROSS.

On 10/02/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/02/15 by CROSS and Rhonda ANTHONY.

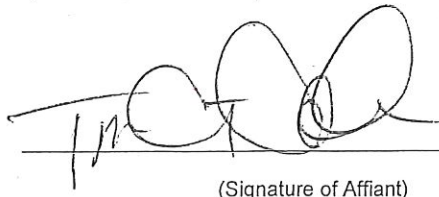
On 10/06/15, a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN, for Buprenorphine (Subutex) 8mg 42 count, and Clonidine .1mg 30 count. This prescription was filled and was picked up on 10/06/15 by unidentified white male who arrived and left with Brooke CROSS.

On 10/12/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/12/15 by Brooke CROSS.

On 10/16/15, a telephone prescription was received at the North Huntingdon Walmart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/16/15 by Brooke CROSS and Rhonda ANTHONY.

On 10/21/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/21/15 by CROSS and Rhonda ANTHONY.

CONTINUED

  
(Signature of Affiant)

 2-13-19



POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number A01-1969890
Defendant Name:	First: Jacqueline	Middle: Rebba	Last: KEYS

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 10/26/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/26/15 by CROSS and Rhonda ANTHONY.

On 11/06/15, a telephone prescription was received at the New Stanton Pharmacy under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was not filled. Rhonda Anthony and Brook CROSS attempted to pick this prescription up and were identified as a result.

On 12/23/15, a telephone prescription was received at the Uniontown Walmart under the name Ronald KINGAN for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 12/23/15 by KINGAN, who was THOMAS's boyfriend.

On 02/02/16, a telephone prescription was received at the Uniontown Walmart under the name Sabrina THOMAS for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 02/02/16 by KINGAN, who was THOMAS's boyfriend.

The involved pharmacies are located at the following addresses.

- Walmart North Huntingdon Pharmacy: 915 Mills Dr. N. Huntingdon, PA 15642
- Walmart Greensburg Pharmacy: 2200 Greengate Center Greensburg, PA 15601
- Walmart Belle Vernon Pharmacy: 100 Sara Way Belle Vernon, PA 15012
- Walmart Uniontown Pharmacy: 355 Walmart Dr. Uniontown, PA 15401
- Medicine Shoppe Greensburg: 434 E. Pittsburgh St. Greensburg, PA 15425
- New Stanton Pharmacy 144 Post Ave. New Stanton, PA 15672

Gabapentin is an unscheduled drug available only by prescription. Clonidine is an unscheduled drug available only by prescription. Buprenorphine (Subutex) is a DEA schedule 3 controlled substance.

The individuals who conspired as a part of this organization are responsible for the illegal diversion of at least 798 documented doses of Buprenorphine (Subutex) (Schedule 3) 8mg pills.

I respectfully request that a warrant of arrest be issued for the above listed defendant, so they may answer to the charges as set forth in this Criminal Complaint/Affidavit of Probable Cause.

(Signature of Affiant)

MMCP 2-13-19



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: WESTMORELAND



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 10-3-01  
MDJ Name: Hon. MARK MANSOUR  
Address: 174 SOUTH GREENGATE RD.  
GREENSBURG, PA 15601  
Telephone: 724-836-1010

DEFENDANT: (NAME and ADDRESS):  
ADAM LOUIS FINCIK  
First Name Middle Name Last Name Gen.  
238 N. 2<sup>ND</sup> ST.  
WEST NEWTON, PA 15089  
412-901-2550

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services?  
C8-105-19 2-13-11 0678197-2 A01-1969890 ☐ YES ☒ NO

GENDER DOB 01/18/84 POB PENNSYLVANIA Add'l DOB Co-Defendant(s) ☐  
☐ Male ☒ Female  
AKA First Name: Middle Name: Last Name: Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.)  
165

FBI Number 89560RC0 MNU Number Ft. HEIGHT in.

Defendant Fingerprinted ☐ YES ☒ NO 5 8

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because:  
(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CHRISTOPHER COLE  
(Name of Affiant - Please Print or Type)

00638746/10564  
(PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop A, Greensburg  
(Identify Department or Agency Represented and Political Subdivision)

PAPSP3400  
(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 is 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: 209 MULTIPLE PHARMACIES LOCATED WITHIN  
(Subdivision Code) WESTMORELAND AND FAYETTE COUNTIES  
(Place-Political Subdivision)

in WESTMORELAND County 64 on or about 06/21/2015-02/02/2016 AT VARIOUS TIMES  
(County Code) (Offense Date)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>08-05-19</b>	Date Filed: <b>2-13-19</b>	OTN/LiveScan Number <b>U678197-2</b>	Complaint/Incident Number <b>A01-1969890</b>
Defendant Name	First: <b>ADAM</b>	Middle: <b>LOUIS</b>	Last: <b>FINCIK</b>

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>1</b>	<b>780-113</b>	<b>(a)(12)</b>	of the	<b>Title 35 , C.S.D.D.C.A.</b>	<b>1</b>	<b>F</b>	<b>18( )/35A</b>
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Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

Statute Description (include the name of statute or ordinance):  
**The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties**

Acts of the accused associated with this Offense:  
 IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT by his/her conduct or conduct of another did knowingly and intentionally acquire or obtain possession of approx. 798 Buprenorphin (Subutex) 8mg pills, a schedule 3 controlled substance, from Multiple area pharmacies by misrepresentation, fraud, forgery, deception or subterfuge, namely, the DEFENDANT and CO-DEFENDANTS caused prescriptions to be telephoned in to pharmacies fraudulently using Dr. Nabil JABBOURS name and DEA #, in violation of Section 780-113(a)(12) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>2</b>	<b>911</b>	<b>(b)(3)</b>	of the	<b>Title 18 , PA Crimes Code</b>	<b>1</b>	<b>F1</b>	<b>/</b>
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Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense:  
 IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(3) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR65-19</u>	Date Filed: <u>3-13-19</u>	OTN/LiveScan Number <u>06781972</u>	Complaint/Incident Number A01-1969890
Defendant Name	First: ADAM	Middle: LOUIS	Last: FINCIK

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<u>3</u>	<u>911</u>	<u>(b)(4)</u>	of the	Title 18 , PA Crimes Code	<u>1</u>	<u>F1</u>		<u>/</u>
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity the DEFENDANT did conspire to violate the provisions of paragraph 3 of this section. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(4) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<u>4</u>	<u>903</u>	<u>(a)(1)</u>	of the	Title 18 , PA Crimes Code	<u>1</u>	<u>F1</u>		<u>/90Z</u>
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

## Criminal Conspiracy

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, with the intent of promoting or facilitating the crime of ; did conspire and agree with Rebekak CARWITHEN, Sabrina THOMAS, Rhonda ANTHONY, Jacqueline KEYS and Brooke CROSS that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of telephoning fraudulent prescriptions into area pharmacies utilizing the identity of Dr. Nabil JABBOUR as well as his DEA number to obtain Buprenorphine (Subutex) by diversion / fraud, in violation of Section 903(a)(1) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-65-19</b>	Date Filed: <b>2-13-19</b>	OTN/LiveScan Number <b>U678197-2</b>	Complaint/Incident Number A01-1969890
Defendant Name	First: ADAM	Middle: LOUIS	Last: FINCIK

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>5</b>	<b>4101</b>	<b>(a)(2)</b>	of the	<b>Title 18 , PA Crimes Code</b>	<b>1</b>	<b>F3</b>	<b>100/250</b>
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Offense #      Section      Subsection      PA Statute (Title)      Counts      Grade      NCIC Offense Code      UCR/NIBRS Code

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

**Forgery**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did make, complete, execute, authenticate, issue or tranfer any writing so that it purports to be the act of who did not authorize the 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, said alteration being, the DEFENDANT caused fraudulent prscriptions to be telephoned/filled/dispensed/picked up and diverted from their intended lawful use utilizing the identifying information of Dr. Nabil JABBOUR including his DEA#, with intent to defraud or injure Dr. Nabil JABBOUR and multiple pharmacies, in violation of Section 4101(a)(2) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	<b>6</b>	<b>4120</b>	<b>(a)</b>	of the	<b>Title 18 , PA Crimes Code</b>	<b>1</b>	<b>F3</b>	<b>110/</b>
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Offense #      Section      Subsection      PA Statute (Title)      Counts      Grade      NCIC Offense Code      UCR/NIBRS Code

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

**Identity Theft**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did possess or use, through any means, identifying information of another person, namely, Dr. Nabil JABBOUR age 64 at the time, without the consent of said person, to further the unlawful purpose of fraudulently obtaining prescriptions by using Dr. JABBOURS name, and DEA # to telephone in multiple prescriptions to local pharmacies, in violation of Section 4120(a) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: <u>C2-65-19</u>	Date Filed: <u>3/13/19</u>	OTN/LiveScan Number <u>U78197-2</u>	Complaint/Incident Number A01-1969890
Defendant Name	First: ADAM	Middle: LOUIS	Last: FINCIK

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 14
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

FEBRUARY 13, 2019  
(Date)

[Signature]  
(Signature of Affiant)

AND NOW, on this date, FEB 13 2019 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.

10-3-01

(Magisterial District Court Number)

[Signature]  
(Issuing Authority)

Mark Wansour  
Magisterial District Judge  
Westmoreland County PA  
My Commission Expires  
1st Monday in January 2022



# POLICE CRIMINAL COMPLAINT

Docket Number: C2-65-19	Date Filed: 11-2-19	OTN/LiveScan Number: 0678191-2	Complaint/Incident Number A01-1969890
Defendant Name:	First: Adam	Middle: Louis	Last: FINCIK

## AFFIDAVIT of PROBABLE CAUSE

I am a sworn member of the Pennsylvania State Police, assigned to the Criminal Investigations Unit at Troop A Greensburg. I have been employed by the Pennsylvania State police since January of 2007. I have been involved in and investigated a multitude of police incidents from property crimes to criminal homicides. The information contained in this affidavit is derived from interviews of involved persons, personal observations and knowledge of this investigation.

On or around December of 2015, I was made aware of a group of individuals who were operating in the Westmoreland and Fayette County areas. This specific group of individuals were causing fraudulent prescriptions to be telephoned in to area pharmacies utilizing Dr. Nabil JABBOUR's identifying information, including his name and Drug Enforcement Administration (DEA) assigned number without his knowledge or consent. JABBOUR's identifying information along with specific information for prescriptions to obtain controlled substances were provided to the pharmacy by individuals within this group. This caused the pharmacy to fill and dispense these fraudulent prescriptions which were then paid for and picked up by individuals within this group. An investigation into this group of individuals resulted in the identification of several of these individuals. These individuals and their actions surrounding these crimes are detailed below.

Sabrina THOMAS was interviewed during this investigation. THOMAS related that she had been employed as the Office Manager for N. JABBOUR. Through her employment prior to becoming office manager, she learned that another known employee had been using JABBOUR's identifying information to obtain fraudulent prescriptions. She decided to start obtaining fraudulent prescriptions herself. While working in her capacity as office manager, she became friendly with a patient named Brooke CROSS. THOMAS and CROSS agreed that THOMAS would use JABBOUR's personal identifying information and DEA number to call in fraudulent prescriptions using CROSS's personal information. THOMAS called in two prescriptions, one for Buprenorphine and one for Gabapentin. CROSS then went and picked up the prescriptions. CROSS kept the Buprenorphine and provided the prescription for Gabapentin to THOMAS. THOMAS is also responsible for calling in other prescriptions in conjunction with CROSS picking them up.

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

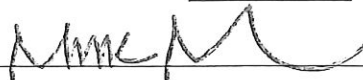
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

  
(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

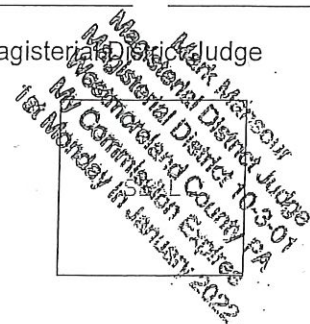
2-13-19

Date



, Magisterial District Judge

My commission expires first Monday of January,







POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CP-65-19	Date Filed: 11-2-19	OTN/LiveScan Number: 0678197-2	Complaint/Incident Number A01-1969890
Defendant Name:	First: Adam	Middle: Louis	Last: FINCIK

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

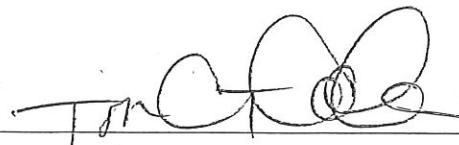
This relationship between THOMAS and CROSS continued. At one point, CROSS was providing other people's names and dates of birth to THOMAS. THOMAS would call in the prescriptions to various local pharmacies and CROSS would pick them up. THOMAS eventually grew tired of making all of the phone calls and provided CROSS with JABBOUR's DEA number and information required for CROSS to call the prescription in herself. CROSS then began to make the phone calls to the pharmacy herself. She knows that CROSS was eventually caught picking up a prescription in New Stanton at a pharmacy. Once this happened, CROSS told her to erase all of her messages and not contact her any longer. THOMAS went on to admit that she had called in prescriptions to the Uniontown, PA Walmart using her boyfriend Ronald KINGAN's name. She also admitted to using her own name and calling in prescriptions with JABBOUR's DEA number.

Brook CROSS was interviewed during this investigation. She indicated that she was once a patient of JABBOUR's. According to CROSS, she started going to Dr. JABBOUR's in Greensburg due to an addiction problem she had with pain pills. She went there for a "detox" program. Since she had insurance, Dr. JABBOUR did a quick detox program for her which did not work. She felt the program was too short and she was not completely "weened" off of the pain pills upon completion of the program. She was approached by Sabrina THOMAS with an offer similar to that described by THOMAS. CROSS allowed THOMAS to use her demographic information and she admitted that she fraudulently obtained the prescriptions described by THOMAS. She also admitted to obtaining a prescription for Gabapentin in her name for THOMAS. She admitted to calling in and picking up multiple of the identified prescriptions in this investigation. She admitted that she called in prescriptions under other individuals names and identifying information while using Dr. JABBOUR's name and DEA #. Phone records confirm that CROSS's phone called area pharmacies on dates and times which correspond to identified fraudulent prescriptions. Video surveillance was also obtained for a majority of the identified fraudulent prescriptions. CROSS is seen on surveillance footage on multiple days picking up fraudulent prescriptions. CROSS identified Jaqueline KEYS as another person who obtained a prescription resulting from this fraud. She told investigators that KEYS also picked up fraudulent prescriptions in her boyfriend Adam FINCIK's name.

I went through photographs from surveillance with CROSS. She cooperated and identified herself and other members of this group in the frames picking up fraudulent prescriptions.

Rebekah CARWITHEN was interviewed as a part of this investigation. Her name was used to obtain fraudulent prescriptions with JABBOUR's DEA #. CARWITHEN was friends with CROSS. CARWITHEN admitted that she was a heroin addict and provided CROSS with her name and identifying information so that she could get suboxone or money so she wouldn't be sick from heroin withdrawal. CROSS told CARWITHEN that she had a friend named Sabrina who worked for a doctor who would take people's names, call in prescriptions. CROSS would pick up the prescription and some type of split would be made between CROSS and THOMAS.

CONTINUED

  
(Signature of Affiant)

MM 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CP-65-19	Date Filed: 11-21-19	OTN/LiveScan Number: 0678197-2	Complaint/Incident Number A01-1969890
Defendant Name:	First: Adam	Middle: Louis	Last: FINCIK

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

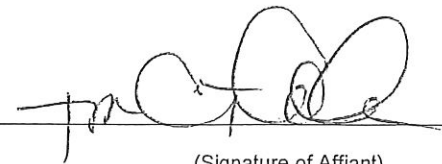
Rhonda ANTHONY was interviewed as a part of this investigation. She admitted that she had been involved with this identified group of individuals who were using Dr. JABBOUR's name and DEA number to obtain fraudulent prescriptions. She was approached by CROSS with this idea as a way to make some extra money. CROSS told her that she had a friend who worked at a doctor's office who could call in prescriptions and that all they would have to do was pick them up. ANTHONY would provide names to CROSS who would then in turn pass the name to her friend who would call in the prescription. She admitted to being a part of this group of individuals and admitted to picking up several fraudulent prescriptions for Buprenorphine. ANTHONY would immediately sell the pills for money or she would give them to her daughter Rebeka CARWITHEN who was a recovering heroin addict. ANTHONY was viewed on surveillance video picking up fraudulent prescriptions. She was identified by a pharmacist at the New Stanton Pharmacy after she was asked to provide her driver's license while picking up a verified fraudulent prescription for Buprenorphine in her mother's name (Shirley ORBIN).

Jaqueline KEYS was interviewed as a result of this investigation. KEYS knows CROSS through a mutual friend. KEYS indicated that her boyfriend Adam FINCIK was in need of a prescription for suboxone as he was taking it without a prescription. CROSS told her that there was a girl that worked at the front of the doctor's office that she knew would get the prescription. She named this girl as "Sabrina". KEYS provided FINCIK's information to CROSS who in turn gave it to THOMAS. THOMAS then called in the prescription using Dr. JABBOUR's name and DEA #. THOMAS called CROSS back and told her where she had called in the prescription. KEYS admitted to picking up this prescription on 07/31/15.

At one-point, CROSS asked KEYS to call Sabrina and act like KEYS was CROSS's sister. CROSS came to KEYS' residence and asked her to call Sabrina and act like her sister to talk her into getting her more prescriptions. She went on to relate that at some point Sabrina apparently became suspicious that CROSS was being watched by the police. She related that she agreed to help CROSS and text/speak with Sabrina from her cell phone. She related that she had told Sabrina that CROSS had gone to Ohio. She related that CROSS did most of the texting and when Sabrina wanted to talk on the phone, KEYS did the talking. KEYS related that she told Sabrina that BROOKE left for Ohio because she was beat up by her boyfriend. This was all in an attempt to get THOMAS to call in more prescriptions. KEYS admitted to picking up at least one prescription for Buprenorphine from a local pharmacy in Adam FINCIK's name. She indicated that her boyfriend Adam FINCIK picked up at least one prescription for Buprenorphine in his own name. Phone records indicate that KEYS and THOMAS had phone contact multiple times. KEYS was identified through video footage as being with CROSS when she picked up a fraudulent prescription in Robert CRAVEN's name. She went on to describe that she was there as a "decoy". The "decoy's" job was to distract CROSS as they went to the pharmacies to pick up these fraudulent prescriptions since CROSS was extremely nervous. She had nothing further to relate.

Adam FINCIK was interviewed as a part of this investigation. He related that KEYS is his girlfriend and that they have children together. He admitted to picking up a fraudulent prescription in his name. He also admitted that he never went to a doctor to get this prescription, he did not pay a co-payment, nor did he undergo a urine test to receive this prescription. He knew that he would need to see a doctor, undergo a urine drug test to have a prescription for suboxone filled. He knew this because he had previously been to another doctor to obtain this exact prescription.

CONTINUED

  
(Signature of Affiant)

 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: C2-65-19	Date Filed: 11-2-13-9	OTN/LiveScan Number: C1078197-2	Complaint/Incident Number A01-1969890
Defendant Name:	First: Adam	Middle: Louis	Last: FINCIK

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Dr. Nabil JABBOUR was interviewed and indicated that the only person out of those mentioned above who has ever been a patient of his was CROSS. She was only a patient for a short period of time. He did not authorize the calling in of any prescriptions for CROSS other than the ones linked to her care. He also has never called in or authorized to be called in prescriptions for CARWITHEN, CROSS, ANTHONY, KEYES, FINCIK or any of the other names used and identified on the prescriptions that this group was using JABBOUR's information to have filled. JABBOUR indicated that the prescriptions were not issued by him and not issued pursuant to his employment as a medical doctor. He did not authorize the use of his name, identifying information or DEA for these purposes

The additional known fraudulent prescriptions listed below were called in and obtained using Dr. Nabil JABBOUR's name, identifying information and DEA #.

On 06/21/15, a telephoned prescription was received at the Medicine Shoppe in Greensburg, PA in the name Brooke CROSS for Gabapentin 800mg, 120 count. This prescription was picked up by CROSS.

On 07/22/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled. Twenty of the pills were picked up on 07/22/15. Eight of the pills were picked up on 07/23/15. Two of the pills were picked up on 07/24/15. Seven of the pills were picked up on 07/25/15. Three of the pills were picked up on 07/26/15. The remaining two pills were picked up on 07/27/15. Brooke CROSS picked up the pills on each of these dates.

On 07/31/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15 by Jaqueline KEYS.

On 08/05/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/05/15 by CROSS.

On 08/17/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15. By his admission, FINCIK picked up this prescription.

On 08/21/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/21/15 by CROSS.

On 08/26/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/26/15, this prescription was picked up Brooke CROSS.

CONTINUED

  
(Signature of Affiant)

 2-13-19



POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CP-6519	Date Filed: 11-2-19	OTN/LiveScan Number: 0678197-2	Complaint/Incident Number A01-1969890
Defendant Name:	First: Adam	Middle: Louis	Last: FINCIK

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 09/04/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/04/15 by Brooke CROSS.

On 09/08/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/08/15 by CROSS.

On 09/16/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert J. CRAVEN, for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/16/15 by Rhonda ANTHONY.

On 09/18/15 a telephoned prescription was received at Greensburg Wal Mart under the name Becca CARWITHEN, for Buprenorphine (Subutex) 8mg, 42. This prescription was filled and was picked up on 09/18/15 by Brooke CROSS.

On 09/28/15, a telephoned prescription was received at Greensburg Wal Mart under the name Shirley ORBIN, for Buprenorphine (Subutex) 8mg 42 count. This prescription was filled and was picked up on 09/28/15 by Brooke CROSS and Rhonda ANTHONY.

On 09/30/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/30/15 by CROSS.

On 10/02/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/02/15 by CROSS and Rhonda ANTHONY.

On 10/06/15, a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN, for Buprenorphine (Subutex) 8mg 42 count, and Clonidine .1mg 30 count. This prescription was filled and was picked up on 10/06/15 by unidentified white male who arrived and left with Brooke CROSS.

On 10/12/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/12/15 by Brooke CROSS.

On 10/16/15, a telephone prescription was received at the North Huntingdon Walmart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/16/15 by Brooke CROSS and Rhonda ANTHONY.

On 10/21/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/21/15 by CROSS and Rhonda ANTHONY.

CONTINUED

  
(Signature of Affiant)

NMKM 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: 04-519	Date Filed: 12-13-19	OTN/LiveScan Number: 0618197-2	Complaint/Incident Number A01-1969890
Defendant Name:	First: Adam	Middle: Louis	Last: FINCIK

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 10/26/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/26/15 by CROSS and Rhonda ANTHONY.

On 11/06/15, a telephone prescription was received at the New Stanton Pharmacy under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was not filled. Rhonda Anthony and Brook CROSS attempted to pick this prescription up and were identified as a result.

On 12/23/15, a telephone prescription was received at the Uniontown Walmart under the name Ronald KINGAN for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 12/23/15 by KINGAN, who was THOMAS's boyfriend.

On 02/02/16, a telephone prescription was received at the Uniontown Walmart under the name Sabrina THOMAS for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 02/02/16 by KINGAN, who was THOMAS's boyfriend.

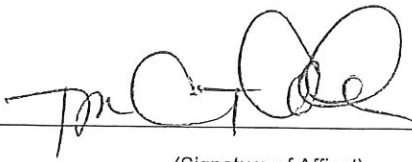
The involved pharmacies are located at the following addresses.

- Walmart North Huntingdon Pharmacy: 915 Mills Dr. N. Huntingdon, PA 15642
- Walmart Greensburg Pharmacy: 2200 Greengate Center Greensburg, PA 15601
- Walmart Belle Vernon Pharmacy: 100 Sara Way Belle Vernon, PA 15012
- Walmart Uniontown Pharmacy: 355 Walmart Dr. Uniontown, PA 15401
- Medicine Shoppe Greensburg: 434 E. Pittsburgh St. Greensburg, PA 15425
- New Stanton Pharmacy 144 Post Ave. New Stanton, PA 15672

Gabapentin is an unscheduled drug available only by prescription. Clonidine is an unscheduled drug available only by prescription. Buprenorphine (Subutex) is a DEA schedule 3 controlled substance.

The individuals who conspired as a part of this organization are responsible for the illegal diversion of at least 798 documented doses of Buprenorphine (Subutex) (Schedule 3) 8mg pills.

I respectfully request that a warrant of arrest be issued for the above listed defendant, so they may answer to the charges as set forth in this Criminal Complaint/Affidavit of Probable Cause.

  
(Signature of Affiant)

 2-13-19

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: WESTMORELAND



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 10-3-01  
MDJ Name: Hon. MARK MANSOUR  
Address: 174 SOUTH GREENGATE RD.  
GREENSBURG, PA 15601  
Telephone: 724-836-1010

DEFENDANT: (NAME and ADDRESS):  
RHONDA R. ANTHONY  
First Name Middle Name Last Name Gen.  
1151 ATLANTIS DR  
WEST NEWTON, PA 15089  
724-633-0080

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services?  
02-61-2019 2-13-19 11678192-4 A01-1969890 ☐ YES ☒ NO

GENDER DOB 04/24/76 POB PENNSYLVANIA Add'l DOB Co-Defendant(s) ☐  
☐ Male  
☒ Female AKA First Name: Middle Name: Last Name: Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.)  
200

FBI Number MNU Number Ft. HEIGHT In.

Defendant Fingerprinted ☐ YES ☒ NO 5 7

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because: \_

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

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. CHRISTOPHER COLE  
(Name of Affiant - Please Print or Type)

00638746/10564

(PSP/IMPOETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop A, Greensburg  
(Identify Department or Agency Represented and Political Subdivision)

PAPSP3400  
(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 is 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:

209 MULTIPLE PHARMACIES LOCATED WITHIN  
(Subdivision Code) WESTMORELAND AND FAYETTE COUNTIES  
(Place-Political Subdivision)

in WESTMORELAND County 64 on or about 06/21/2015-02/02/2016 AT VARIOUS TIMES  
(County Code) (Offense Date)





# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-61-19</i>	Date Filed: <i>2/13/19</i>	OTN/LiveScan Number <i>0678192-4</i>	Complaint/Incident Number A01-1969890
Defendant Name	First: RHONDA	Middle: R.	Last: ANTHONY

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	1	780-113	(a)(12)	of the	Title 35 , C.S.D.D.C.A.	1	F		18( )/35A
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

**The Controlled Substance, Drug, Device and Cosmetic Act: Prohibited Acts; Penalties**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT by his/her conduct or conduct of another did knowingly and intentionally acquire or obtain possession of approx. 798 Buprenorphin (Subutex) 8mg pills, a schedule 3 controlled substance, from Multiple area pharmacies by misrepresentation, fraud, forgery, deception or subterfuge, namely, the DEFENDANT and CO-DEFENDANTS caused prescriptions to be telephoned in to pharmacies fraudulently using Dr. Nabil JABBOURS name and DEA #, in violation of Section 780-113(a)(12) of the PA Controlled Substance, Drug, Device and Cosmetic Act.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	911	(b)(3)	of the	Title 18 , PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

**CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(3) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR. 4-1-19</i>	Date Filed: <i>2/13/19</i>	OTN/LiveScan Number <i>010781924</i>	Complaint/Incident Number A01-1969890
Defendant Name	First: RHONDA	Middle: R.	Last: ANTHONY

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	911	(b)(4)	of the	Title 18 , PA Crimes Code	1	F1		/
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

## CORRUPT ORGANIZATIONS

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, while employed by or associated with any enterprise to conduct or participate, directly or indirectly, in the conduct of such enterprises affairs through a pattern of racketeering activity the DEFENDANT did conspire to violate the provisions of paragraph 3 of this section. TO WIT the DEFENDANT as a member of an organization of individuals did directly participate in the acquisition of fraudulent prescriptions, using Dr. Nabil JABBOUR's identifying information and DEA # in concert with multiple CO-DEFENDANTS in violation of Section 911(b)(4) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	4	903	(a)(1)	of the	Title 18 , PA Crimes Code	1	F1		/90Z
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

## Criminal Conspiracy

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT, with the intent of promoting or facilitating the crime of , did conspire and agree with Rebekah CARWITHEN, Sabrina THOMAS, Brook CROSS, Jacqueline KEYS and Adam FINCIK that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof, did commit the act(s) of telephoning fraudulent prescriptions into area pharmacies utilizing the identity of Dr. Nabil JABBOUR as well as his DEA number to obtain Buprenorphine (Subutex) by diversion / fraud, in violation of Section 903(a)(1) of the PA Crimes Code.





# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR. 6-1-19</i>	Date Filed: <i>2-15-19</i>	OTN/LiveScan Number <i>0678192-4</i>	Complaint/Incident Number A01-1969890
Defendant Name	First: RHONDA	Middle: R.	Last: ANTHONY

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	4101	(a)(2)	of the	Title 18 , PA Crimes Code	1	F3		100/250
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

**Forgery**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did make, complete, execute, authenticate, issue or transfer any writing so that it purports to be the act of who did not authorize the 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, said alteration being, the DEFENDANT caused fraudulent prescriptions to be telephoned/filled/dispensed/picked up and diverted from their intended lawful use utilizing the identifying information of Dr. Nabil JABBOUR including his DEA#, with intent to defraud or injure Dr. Nabil JABBOUR and multiple pharmacies, in violation of Section 4101(a)(2) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	6	4120	(a)	of the	Title 18 , PA Crimes Code	1	F3		110/
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

**Identity Theft**

Acts of the accused associated with this Offense:

IN THAT, on or about 06/21/2015-02/02/2016, THE DEFENDANT did possess or use, through any means, identifying information of another person, namely, Dr. Nabil JABBOUR age 64 at the time, without the consent of said person, to further the unlawful purpose of fraudulently obtaining prescriptions by using Dr. JABBOUR'S name, and DEA # to telephone in multiple prescriptions to local pharmacies, in violation of Section 4120(a) of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

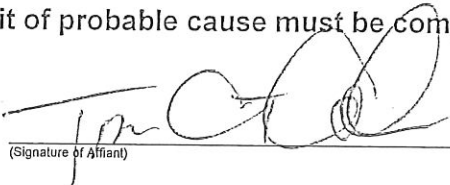
Docket Number: <u>CR. 61-19</u>	Date Filed: <u>2/13/19</u>	OTN/LiveScan Number <u>0678192.4</u>	Complaint/Incident Number A01-1969890
Defendant Name	First: RHONDA	Middle: R.	Last: ANTHONY

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. §4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 14
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

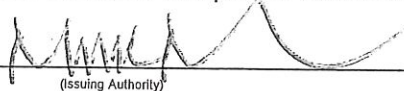
FEBRUARY 13, 2019  
(Date)

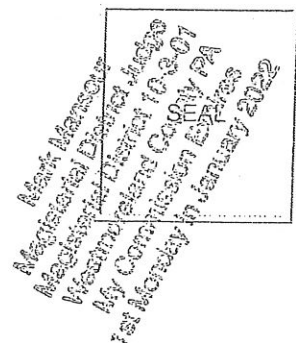
  
(Signature of Affiant)

AND NOW, on this date, FEB 13 2019 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.

10-3-01

(Magisterial District Court Number)

  
(Issuing Authority)







# POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-61-19</u>	Date Filed: <u>2-13-19</u>	OTN/LiveScan Number: <u>06781924</u>	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rhonda	Middle: R.	Last: ANTHONY

## AFFIDAVIT of PROBABLE CAUSE

I am a sworn member of the Pennsylvania State Police, assigned to the Criminal Investigations Unit at Troop A Greensburg. I have been employed by the Pennsylvania State police since January of 2007. I have been involved in and investigated a multitude of police incidents from property crimes to criminal homicides. The information contained in this affidavit is derived from interviews of involved persons, personal observations and knowledge of this investigation.

On or around December of 2015, I was made aware of a group of individuals who were operating in the Westmoreland and Fayette County areas. This specific group of individuals were causing fraudulent prescriptions to be telephoned in to area pharmacies utilizing Dr. Nabil JABBOUR's identifying information, including his name and Drug Enforcement Administration (DEA) assigned number without his knowledge or consent. JABBOUR's identifying information along with specific information for prescriptions to obtain controlled substances were provided to the pharmacy by individuals within this group. This caused the pharmacy to fill and dispense these fraudulent prescriptions which were then paid for and picked up by individuals within this group. An investigation into this group of individuals resulted in the identification of several of these individuals. These individuals and their actions surrounding these crimes are detailed below.

Sabrina THOMAS was interviewed during this investigation. THOMAS related that she had been employed as the Office Manager for N. JABBOUR. Through her employment prior to becoming office manager, she learned that another known employee had been using JABBOUR's identifying information to obtain fraudulent prescriptions. She decided to start obtaining fraudulent prescriptions herself. While working in her capacity as office manager, she became friendly with a patient named Brooke CROSS. THOMAS and CROSS agreed that THOMAS would use JABBOUR's personal identifying information and DEA number to call in fraudulent prescriptions using CROSS's personal information. THOMAS called in two prescriptions, one for Buprenorphine and one for Gabapentin. CROSS then went and picked up the prescriptions. CROSS kept the Buprenorphine and provided the prescription for Gabapentin to THOMAS. THOMAS is also responsible for calling in other prescriptions in conjunction with CROSS picking them up.

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

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

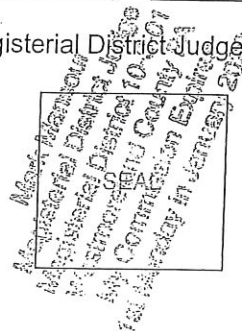
  
(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_

2-13-19 Date

My commission expires first Monday of January,

\_\_\_\_\_, Magisterial District Judge







POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CR-61-19	Date Filed: 2-13-19	OTN/LiveScan Number: U078192-4	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rhonda	Middle: R.	Last: ANTHONY

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**


This relationship between THOMAS and CROSS continued. At one point, CROSS was providing other people's names and dates of birth to THOMAS. THOMAS would call in the prescriptions to various local pharmacies and CROSS would pick them up. THOMAS eventually grew tired of making all of the phone calls and provided CROSS with JABBOUR's DEA number and information required for CROSS to call the prescription in herself. CROSS then began to make the phone calls to the pharmacy herself. She knows that CROSS was eventually caught picking up a prescription in New Stanton at a pharmacy. Once this happened, CROSS told her to erase all of her messages and not contact her any longer. THOMAS went on to admit that she had called in prescriptions to the Uniontown, PA Walmart using her boyfriend Ronald KINGAN's name. She also admitted to using her own name and calling in prescriptions with JABBOUR's DEA number.

Brook CROSS was interviewed during this investigation. She indicated that she was once a patient of JABBOUR's. According to CROSS, she started going to Dr. JABBOUR's in Greensburg due to an addiction problem she had with pain pills. She went there for a "detox" program. Since she had insurance, Dr. JABBOUR did a quick detox program for her which did not work. She felt the program was too short and she was not completely "weened" off of the pain pills upon completion of the program. She was approached by Sabrina THOMAS with an offer similar to that described by THOMAS. CROSS allowed THOMAS to use her demographic information and she admitted that she fraudulently obtained the prescriptions described by THOMAS. She also admitted to obtaining a prescription for Gabapentin in her name for THOMAS. She admitted to calling in and picking up multiple of the identified prescriptions in this investigation. She admitted that she called in prescriptions under other individuals names and identifying information while using Dr. JABBOUR's name and DEA #. Phone records confirm that CROSS's phone called area pharmacies on dates and times which correspond to identified fraudulent prescriptions. Video surveillance was also obtained for a majority of the identified fraudulent prescriptions. CROSS is seen on surveillance footage on multiple days picking up fraudulent prescriptions. CROSS identified Jaqueline KEYS as another person who obtained a prescription resulting from this fraud. She told investigators that KEYS also picked up fraudulent prescriptions in her boyfriend Adam FINCIK's name.

I went through photographs from surveillance with CROSS. She cooperated and identified herself and other members of this group in the frames picking up fraudulent prescriptions.

Rebekah CARWITHEN was interviewed as a part of this investigation. Her name was used to obtain fraudulent prescriptions with JABBOUR's DEA #. CARWITHEN was friends with CROSS. CARWITHEN admitted that she was a heroin addict and provided CROSS with her name and identifying information so that she could get suboxone or money so she wouldn't be sick from heroin withdrawal. CROSS told CARWITHEN that she had a friend named Sabrina who worked for a doctor who would take people's names, call in prescriptions. CROSS would pick up the prescription and some type of split would be made between CROSS and THOMAS.

CONTINUED

  
(Signature of Affiant)

Mme ML 2-13-19





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: C.R. 01-19	Date Filed: 5/13/19	OTN/LiveScan Number: 0678924	Complaint/Incident Number A01-1969890
Defendant Name:	First: RHONDA	Middle: R.	Last: ANTHONY

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

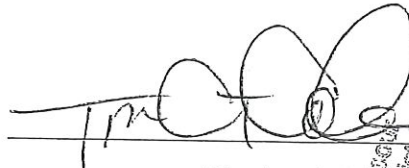
Rhonda ANTHONY was interviewed as a part of this investigation. She admitted that she had been involved with this identified group of individuals who were using Dr. JABBOUR's name and DEA number to obtain fraudulent prescriptions. She was approached by CROSS with this idea as a way to make some extra money. CROSS told her that she had a friend who worked at a doctor's office who could call in prescriptions and that all they would have to do was pick them up. ANTHONY would provide names to CROSS who would then in turn pass the name to her friend who would call in the prescription. She admitted to being a part of this group of individuals and admitted to picking up several fraudulent prescriptions for Buprenorphine. ANTHONY would immediately sell the pills for money or she would give them to her daughter Rebeka CARWITHEN who was a recovering heroin addict. ANTHONY was viewed on surveillance video picking up fraudulent prescriptions. She was identified by a pharmacist at the New Stanton Pharmacy after she was asked to provide her driver's license while picking up a verified fraudulent prescription for Buprenorphine in her mother's name (Shirley ORBIN).

Jaqueline KEYS was interviewed as a result of this investigation. KEYS knows CROSS through a mutual friend. KEYS indicated that her boyfriend Adam FINCIK was in need of a prescription for suboxone as he was taking it without a prescription. CROSS told her that there was a girl that worked at the front of the doctor's office that she knew would get the prescription. She named this girl as "Sabrina". KEYS provided FINCIK's information to CROSS who in turn gave it to THOMAS. THOMAS then called in the prescription using Dr. JABBOUR's name and DEA #. THOMAS called CROSS back and told her where she had called in the prescription. KEYS admitted to picking up this prescription on 07/31/15.

At one-point, CROSS asked KEYS to call Sabrina and act like KEYS was CROSS's sister. CROSS came to KEYS' residence and asked her to call Sabrina and act like her sister to talk her into getting her more prescriptions. She went on to relate that at some point Sabrina apparently became suspicious that CROSS was being watched by the police. She related that she agreed to help CROSS and text/speak with Sabrina from her cell phone. She related that she had told Sabrina that CROSS had gone to Ohio. She related that CROSS did most of the texting and when Sabrina wanted to talk on the phone, KEYS did the talking. KEYS related that she told Sabrina that BROOKE left for Ohio because she was beat up by her boyfriend. This was all in an attempt to get THOMAS to call in more prescriptions. KEYS admitted to picking up at least one prescription for Buprenorphine from a local pharmacy in Adam FINCIK's name. She indicated that her boyfriend Adam FINCIK picked up at least one prescription for Buprenorphine in his own name. Phone records indicate that KEYS and THOMAS had phone contact multiple times. KEYS was identified through video footage as being with CROSS when she picked up a fraudulent prescription in Robert CRAVEN's name. She went on to describe that she was there as a "decoy". The "decoy's" job was to distract CROSS as they went to the pharmacies to pick up these fraudulent prescriptions since CROSS was extremely nervous. She had nothing further to relate.

Adam FINCIK was interviewed as a part of this investigation. He related that KEYS is his girlfriend and that they have children together. He admitted to picking up a fraudulent prescription in his name. He also admitted that he never went to a doctor to get this prescription, he did not pay a co-payment, nor did he undergo a urine test to receive this prescription. He knew that he would need to see a doctor, undergo a urine drug test to have a prescription for suboxone filled. He knew this because he had previously been to another doctor to obtain this exact prescription.

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(Signature of Affiant)



2-13

Mark M. ...  
Magisterial District Judge  
Judea County PA  
Commission Expires  
Monday in January 2022





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CR 01-19	Date Filed: 2/13/19	OTN/LiveScan Number: 0678192-4	Complaint/Incident Number A01-1969890
Defendant Name:	First: RHONDA	Middle: R.	Last: ANTHONY

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Dr. Nabil JABBOUR was interviewed and indicated that the only person out of those mentioned above who has ever been a patient of his was CROSS. She was only a patient for a short period of time. He did not authorize the calling in of any prescriptions for CROSS other than the ones linked to her care. He also has never called in or authorized to be called in prescriptions for CARWITHEN, CROSS, ANTHONY, KEYES, FINCIK or any of the other names used and identified on the prescriptions that this group was using JABBOUR's information to have filled. JABBOUR indicated that the prescriptions were not issued by him and not issued pursuant to his employment as a medical doctor. He did not authorize the use of his name, identifying information or DEA for these purposes

The additional known fraudulent prescriptions listed below were called in and obtained using Dr. Nabil JABBOUR's name, identifying information and DEA #.

On 06/21/15, a telephoned prescription was received at the Medicine Shoppe in Greensburg, PA in the name Brooke CROSS for Gabapentin 800mg, 120 count. This prescription was picked up by CROSS.

On 07/22/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled. Twenty of the pills were picked up on 07/22/15. Eight of the pills were picked up on 07/23/15. Two of the pills were picked up on 07/24/15. Seven of the pills were picked up on 07/25/15. Three of the pills were picked up on 07/26/15. The remaining two pills were picked up on 07/27/15. Brooke CROSS picked up the pills on each of these dates.

On 07/31/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15 by Jaqueline KEYES.

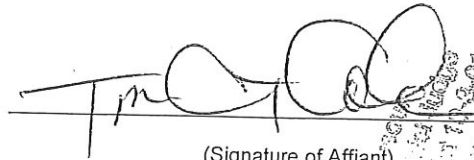

On 08/05/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/05/15 by CROSS.

On 08/17/15, a telephone prescription was received at the North Huntingdon Walmart under the name Adam FINCIK for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 07/31/15. By his admission, FINCIK picked up this prescription.

On 08/21/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/21/15 by CROSS.

On 08/26/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 08/26/15, this prescription was picked up Brooke CROSS.

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(Signature of Affiant)  
  
Notary Public  
My Comm. Expires 12/31/2022  
Notary Public  
My Comm. Expires 12/31/2022





POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: CR-61-15	Date Filed: 2/15/19	OTN/LiveScan Number: 00787924	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rhonda	Middle: R.	Last: ANTHONY

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 09/04/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/04/15 by Brooke CROSS.

On 09/08/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/08/15 by CROSS.

On 09/16/15 a telephoned prescription was received at Greensburg Wal Mart under the name Robert J. CRAVEN, for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/16/15 by Rhonda ANTHONY.

On 09/18/15 a telephoned prescription was received at Greensburg Wal Mart under the name Becca CARWITHEN, for Buprenorphine (Subutex) 8mg, 42. This prescription was filled and was picked up on 09/18/15 by Brooke CROSS.

On 09/28/15, a telephoned prescription was received at Greensburg Wal Mart under the name Shirley ORBIN, for Buprenorphine (Subutex) 8mg 42 count. This prescription was filled and was picked up on 09/28/15 by Brooke CROSS and Rhonda ANTHONY.

On 09/30/15, a telephoned prescription was received at Belle Vernon Wal Mart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 09/30/15 by CROSS.

On 10/02/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/02/15 by CROSS and Rhonda ANTHONY.

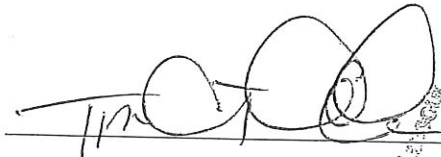

On 10/06/15, a telephoned prescription was received at Greensburg Wal Mart under the name Robert CRAVEN, for Buprenorphine (Subutex) 8mg 42 count, and Clonidine .1mg 30 count. This prescription was filled and was picked up on 10/06/15 by unidentified white male who arrived and left with Brooke CROSS.

On 10/12/15 a telephoned prescription was received at Greensburg Wal Mart under the name Rebecca CARWITHEN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/12/15 by Brooke CROSS.

On 10/16/15, a telephone prescription was received at the North Huntingdon Walmart under the name Brooke CROSS for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/16/15 by Brooke CROSS and Rhonda ANTHONY.

On 10/21/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/21/15 by CROSS and Rhonda ANTHONY.

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(Signature of Affiant)  
  
2-15-19  
Affiant: [Signature]  
Subscribed: [Signature]  
Sworn: [Signature]  
Notary Public  
Notary Seal  
Notary Commission Expires: 10-3-21  
Notary Commission Number: [Number]  
Notary State: [State]



POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE

Docket Number: 00-001-19	Date Filed: 11/13/19	OTN/LiveScan Number: U678192-4	Complaint/Incident Number A01-1969890
Defendant Name:	First: Rhonda	Middle: R.	Last: ANTHONY

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

On 10/26/15, a telephone prescription was received at the North Huntingdon Walmart under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was filled and was picked up on 10/26/15 by CROSS and Rhonda ANTHONY.

On 11/06/15, a telephone prescription was received at the New Stanton Pharmacy under the name Shirley ORBIN for Buprenorphine (Subutex) 8mg, 42 count. This prescription was not filled. Rhonda Anthony and Brook CROSS attempted to pick this prescription up and were identified as a result.

On 12/23/15, a telephone prescription was received at the Uniontown Walmart under the name Ronald KINGAN for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 12/23/15 by KINGAN, who was THOMAS's boyfriend.

On 02/02/16, a telephone prescription was received at the Uniontown Walmart under the name Sabrina THOMAS for Gabapentin 800 mg, 120 count. This prescription was filled and was picked up on 02/02/16 by KINGAN, who was THOMAS's boyfriend.

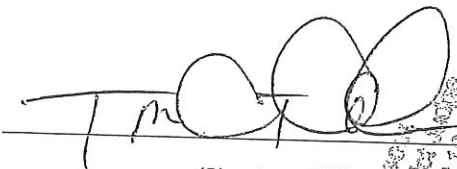
The involved pharmacies are located at the following addresses.

- Walmart North Huntingdon Pharmacy: 915 Mills Dr. N. Huntingdon, PA 15642
- Walmart Greensburg Pharmacy: 2200 Greengate Center Greensburg, PA 15601
- Walmart Belle Vernon Pharmacy: 100 Sara Way Belle Vernon, PA 15012
- Walmart Uniontown Pharmacy: 355 Walmart Dr. Uniontown, PA 15401
- Medicine Shoppe Greensburg: 434 E. Pittsburgh St. Greensburg, PA 15425
- New Stanton Pharmacy 144 Post Ave. New Stanton, PA 15672

Gabapentin is an unscheduled drug available only by prescription. Clonondine is an unscheduled drug available only by prescription. Buprenorphine (Subutex) is a DEA schedule 3 controlled substance.

The individuals who conspired as a part of this organization are responsible for the illegal diversion of at least 798 documented doses of Buprenorphine (Subutex) (Schedule 3) 8mg pills.

I respectfully request that a warrant of arrest be issued for the above listed defendant, so they may answer to the charges as set forth in this Criminal Complaint/Affidavit of Probable Cause.

  
(Signature of Affiant)  
2-13-19  
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