

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: CLARION



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 18-3-01  
MDJ: Hon. DUANE QUINN  
Address: 22 NORTH 6TH AVE. CLARION,  
PA 16214  
Telephone: (814)226-9355

DEFENDANT: (NAME and ADDRESS):  
SAMANTHA ANN FERGUSON  
First Name Middle Name Last Name Gen.  
496 SIMPSON ROAD CORSICA, PA 15829

NCIC Extradition Code Type  
 1-Felony Full  4-Felony No Ext.  B-Misdemeanor Limited  E-Misdemeanor Pending  
 2-Felony Ltd.  5-Felony Pend.  C-Misdemeanor Surrounding States  Distance: \_\_\_\_\_  
 3-Felony Surrounding States  A-Misdemeanor Full  D-Misdemeanor No Extradition

DEFENDANT IDENTIFICATION INFORMATION  
Docket Number CR-48-19 Date Filed 3/19/19 OTN/LiveScan Number U689282-6 Complaint/Incident Number 63-466 SID \_\_\_\_\_ Request Lab Services?  YES  NO

GENDER  Male  Female  
DOB 06/02/1992 POB \_\_\_\_\_ 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/Aubn.)  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)

Driver License State PA License Number 29733489 Expires: 06/03/2020 WEIGHT (lbs.) \_\_\_\_\_

DNA  YES  NO DNA Location \_\_\_\_\_

FBI Number \_\_\_\_\_ MNU Number \_\_\_\_\_ Ft. HEIGHT. In. \_\_\_\_\_

Defendant Fingerprinted  YES  NO 5 9

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

DAG ALICIA S. WERNER Alicia Werner 3/19/2019  
(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, STEPHEN J. ADAMETZ & KATHERINE A. BERGGREN SPECIAL AGENT II #507, PA STATE TROOPER  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of PA OFFICE OF ATTORNEY GENERAL - BCI PA0222400  
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [204] CLARION TWP  
(Subdivision Code) (Place-Political Subdivision)

in CLARION County [16] on or about OCTOBER 21, 2016 THROUGH OCTOBER 16, 2018  
(County Code) (Date)



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR-48-19</b>	Date Filed: <b>3/19/19</b>	OTN/LiveScan Number <b>U 689282-6</b>	Complaint/Incident Number <b>63-466</b>
Defendant Name	First: <b>SAMANTHA</b>	Middle: <b>ANN</b>	Last: <b>FERGUSON</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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input checked="" type="checkbox"/> Lead?	<b>1</b> Offense#	<b>2903</b> Section	<b>C</b> Subsection	<b>of the</b> <b>18 PA C.S.</b> PA Statute (Title)	<b>2</b> Counts	<b>F-2</b> Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The Actor, Samantha A. Ferguson, on or about, October 21, 2016 through October 16, 2018, in the County of Clarion, Falsely Imprisoned the victim JANE DOE 1 (being under the age of 18 years of age) so as to interfere substantially with her liberty. That is to say Samantha A. Ferguson being the parent of Jane Doe 1 restrained her by handcuffing and or duct taping Jane Doe 1's hands for the purpose of punishing the victim, in violation Section 2903, Subsection (C) of PA Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903
---	---	--	---

<input type="checkbox"/> Lead?	<b>2</b> Offense#	Section	<b>A,1</b> Subsection	<b>of the</b> <b>18 PA C.S.</b> PA Statute (Title)	<b>1</b> Counts	<b>F-2</b> Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The Actor, Samantha A. Ferguson, on or about October 21, 2016 through October 16, 2018, in the county of Clarion, conspired with Joseph J. Ferguson to Falsely Imprison Jane Doe 1, being under the age of 18 years of age and the daughter of the Actors by handcuffing and or duct taping the victims hands, in front of and behind her back for punishment, in violation Section 2903, C of PA Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	<b>3</b> Offense#	<b>4304</b> Section	<b>A1</b> Subsection	<b>of the</b> <b>18 PA C.S.</b> PA Statute (Title)	<b>1</b> Counts	<b>F-3</b> Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

Acts of the accused associated with this Offense: The Actor, Samantha A. Ferguson, on or about, October 21, 2016 through October 16, 2018, in the county of Clarion, Endangering the Welfare of Jane Doe 1 by violating a duty of care, protection or support through a repeated course of conduct, that is to say the actor, repeatedly handcuffed and duct taped Jane Doe 1's hands inflicting pain for the purpose of punishing the victim in violation of section 4304 (a)1 of the PA Crimes Code.



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-48-19</i>	Date Filed: <i>3/19/19</i>	OTN/LiveScan Number <i>U 689282-6</i>	Complaint/Incident Number <i>63-466</i>
Defendant Name	First: <i>SAMANTHA</i>	Middle: <i>ANN</i>	Last: <i>FERGUSON</i>

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

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>
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<input type="checkbox"/> Lead?	<i>4</i>	<i>6301</i>	<i>(A)1</i>	<i>of the</i>	<i>18 PA C.S.</i>	<i>1</i>	<i>M-1</i>		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: *The actor, Samantha A. Ferguson, on or about, October 21, 2016 through October 16, 2018 in the County of Clarion, being 18 years of age or upwards, corrupted or tended to corrupt the morals of Jane Doe 2 who was under the age of 18 yrs of age, by an act, or aided and abetted, enticed or encouraged said minor in the commission of a crime, or knowingly assisted or encouraged such minor, namely, False Imprisonment, in violation of section 6301(A)1 of the PA Crimes Code*

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>
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<input type="checkbox"/> Lead?				<i>of the</i>		<i>0</i>			
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense:

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>
---	---	--	--

<input type="checkbox"/> Lead?				<i>of the</i>		<i>0</i>			
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-48-16</i>	Date Filed: <i>3/19/19</i>	OTN/LiveScan Number: <i>U 689282-L</i>	Complaint/Incident Number: <i>63-466</i>
Defendant Name	First: <i>SAMANTH</i>	Middle: <i>ANN</i>	Last: <i>FERGUSON</i>

- 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 \_\_\_.

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.)**

ADAMETZ / BERGGREN

3/19/2019

(Date)

*SA S. A. [Signature]*  
 (Signature of Affiant)

*TPR Katherine A. Berggren #12466*

AND NOW, on this date 3/19/19

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.

18-3-01

(Magisterial District Court Number)

*[Signature]*  
 (Issuing Authority)





**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

<b>Docket Number:</b> CR-48-19	<b>Date Filed:</b> 3/19/19	<b>OTN/Live Scan Number</b> U 689282-4	<b>Complaint/Incident Number</b> 63-466
<b>Defendant Name:</b>	<b>First:</b> SAMANTHA	<b>Middle:</b> ANN	<b>Last:</b> FERGUSON

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

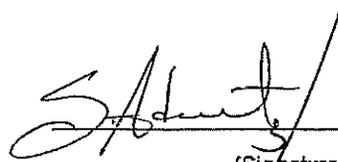
Your Co-Affiant is, Special Agent Stephen J. Adametz from the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Western Regional Office. S.A. Adametz has approximately twenty two (22) years' criminal investigation experience as a Municipal Police Officer and currently as an agent with the Office of Attorney General. Your Affiant has made many felony arrests as a sworn Officer/Special Agent to include thefts, homicides, child and adult sex crimes. This Affiant has attended several trainings classes and is certified in Class A, Electronic Surveillance (No. A-4718).

The Co-affiant of this affidavit is Tpr. Katherine A. BERGGREN, a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of Section 5702 of the Pennsylvania Crimes Code and as such, I am empowered to make arrests for criminal offenses enumerated therein. I have been a Pennsylvania State Trooper since January 6, 2014 and I have been assigned to the Troop "C" Clarion Station, Patrol Unit since August of 2016 and the Criminal Investigations Unit since March of 2017. I have received numerous trainings to include child abuse training, rape investigation, sexual assault investigation, Reid Technique of investigative interviewing in child abuse cases, Reid Technique of investigative interviewing and interrogation, application for and service of numerous search warrants, and other numerous criminal investigative trainings. I have obtained certifications to allow for the use of Electronic Surveillance pursuant to the provisions of Chapter 57 of title 18 of the Pennsylvania Crimes Code, "Class A" certification, certification number "A-5659."

This investigation was initiated by a Pennsylvania Childline report (CWIS ID: 8326356) that was called in to Pennsylvania Child Welfare Services on October 10, 2018 at 3:30 PM. A referral was made by the Clarion County Children Youth and Families (CYF) Services to the Western Regional Office of CYF due to a conflict Clarion CYF had with the family involved. On October 23, 2018 Affiant Berggren from the Pennsylvania State Police began an investigation into this incident for endangering the welfare of the children.

On January 3, 2019 the Pennsylvania Office of Attorney General (OAG) assumed jurisdiction from Clarion County District Attorney, Mark T. Aaron pursuant to 71P.S. § 732-205(a)(3) of the Commonwealth Attorney's Act due to a conflict of interest from his office.

On October 24, 2018 your Affiant attended an interview with the juvenile victim (Jane Doe 1) at Clarion County CYF, 214 South 7<sup>th</sup> Ave, Suite B, Clarion PA., 16214. This interview included Clarion County CYF case worker Sarah Wallace (Wallace) and Rebecca Lewandowski (Lewandowski) from the Western Regional Office of CYF. Jane Doe 1 informed them that her sister (Jane Doe 2) and she live with and were adopted by Samantha Ann Ferguson, DOB, June 6, 1992 and Joseph J. Ferguson, DOB, December 5, 1983. She stated that they were two of six children in the Ferguson household (496 Simpson Road, Corsica, PA 15829) and that all six children were home schooled by Samantha Ferguson.

  
 \_\_\_\_\_  
 (Signature of Affiant)  
 TPR. Katherine A. Berggren #12460



**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR-48-19</i>	Date Filed: <i>3/19/19</i>	OTN/Live Scan Number <i>U 689282-4</i>	Complaint/Incident Number 63-466
Defendant Name:	First: SAMANTHA	Middle: ANN	Last: FERGUSON

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

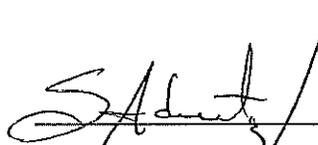
Jane Doe was questioned regarding the allegations of punishment that were raised in the Childline report. She informed your Affiant and others that all the siblings were disciplined for misbehavior by way of spanking with a bare hand or other items such as a wooden spoon. Jane Doe 1 stated that she was made to stand in a utility closet for her punishment. Our investigation found that this utility closet has exposed electrical wires, piping and other sensitive household hardware that could pose a danger to children left alone in this location in the dark. This punishment in the closet was done with the door both opened and closed. On one incident of discipline while she was in the closet, Samantha Ferguson caught Jane Doe 1 playing, not sitting still as instructed.

As a result of Jane Doe 1 playing during discipline, she stated that Samantha Ferguson handcuffed and or duct taped her hands in front of her or behind her back. Thereafter when she was disciplined in the utility closet, her hands were bound. When asked how many times she was punished in this fashion, Jane Doe 1 stated "*a couple of times.*" In addition to being placed in the utility closet with her hands bound, Jane Doe 1 told your Affiant that Samantha Ferguson would handcuff her hands behind her back and around a "*blue bar*" that was part of a bunk bed in a family bedroom. Jane Doe 1 advised that she would be seated on the bed with her feet straight out in front of her while cuffed to the bed post. She added that she was often bound by the handcuffs or duct tape for several hour at a time, only let out to be fed depending on the time of day.

Jane Doe 1 explained that her sister, Jane Doe 2 would sometimes handcuff her under Samantha Ferguson's direction for punishment. In these instances, if Samantha Ferguson was not around, Jane Doe 2 would be instructed to handcuff Jane Doe 1 and keep the key until she got back to the residence. Jane Doe 1 explained that when she had her hands duct taped in front of her, Samantha Ferguson would have her clasp her hands together and intertwine her fingers so her wrists could be taped together. She advised that in addition to being handcuffed in the closet and bedroom, her hands were also bound in a moving car as Samantha Ferguson drove to a local Taco Bell restaurant.

Jane Doe 1 stated that when her hands were cuffed or taped it was painful and often bruised her wrists. She added that on one occasion she was yelling out in pain to have her parents release her. Jane Doe 1 stated that her yelling prompted Samantha Ferguson to place duct tape over her mouth.

Through the course of investigation it was found that Samantha and Joseph Ferguson were made to participate in Mandated Reporting Training in order to become a foster/adoptive parent. It was further discovered that the Ferguson's stopped giving Jane Doe 1 her medication for Attention-Deficit/Hyperactivity Disorder (ADHD) and halted her in person therapy due to their religious beliefs that they could pray away Jane Doe 1's problems.

  
\_\_\_\_\_  
(Signature of Affiant)

TPR Katherine A Bergeron #12460



**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

<b>Docket Number:</b> CR-48-19	<b>Date Filed:</b> 3/19/19	<b>OTN/Live Scan Number</b> U 689282-6	<b>Complaint/Incident Number</b> 63-466
<b>Defendant Name:</b>	<b>First:</b> SAMANTHA	<b>Middle:</b> ANN	<b>Last:</b> FERGUSON

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Your Affiants found that in addition to making Jane Doe 2 handcuff her sister and administer punishment for them, the Ferguson's also made Jane Doe 2 serve her own punishment in the downstairs utility closet. On November 2, 2018 case workers from CYF interviewed Samantha Ferguson in her residence. In this conversation Samantha Ferguson admitted to the aforementioned methods of restraint/abuse with Jane Doe 1 and added that she placed her sister, Jane Doe 2 in a utility closet as well. At this time, Samantha Ferguson reported to CYF case workers that Jane Doe 2 was placed in the closet until she "gave her life to Jesus" and accepted the Ferguson's religion.

On Wednesday, October 24, 2018 a dependency hearing was held in the Clarion County Court of Common Pleas before the Honorable Paul H. Millin. In that hearing, Joseph J. Ferguson testified that although he was not the primary parent that administered the punishment, he knew of and agreed to the use of the handcuffs and duct tape by his wife on Jane Doe 1. Joseph also testified that he was aware that Jane Doe 1 was handcuffed to the bed between five and seven times. Furthermore, he testified that she was either taped or handcuffed in the utility closet once. Joseph went on to testify before the court, that with his blessing, Jane Doe 1 had her mouth taped shut and that on one of these occasions Jane Doe 1 was restrained in the dark.

Based on the above, your Affiants respectfully request an arrest warrant be issued for Samantha A. Ferguson (DOB, June 2, 1992) of 496 Simpson Road, Corsica, PA 15829, Clarion County for: *False Imprisonment*, 18 PA. C.S.A. 2903, C (F2), 2 counts, one for the utility closet and one for the bed room on Jane Doe 1. *Criminal Conspiracy*, 18 PA. C.S.A. 903, A1 (F2), Underlying offense of False Imprisonment, handcuffing Jane Doe 1. *Endangering the Welfare of Child*, course of conduct 18 PA. C.S.A.4304, A1 (F3), on Jane Doe 1. *Corruption of Minors*, 18 PA. C.S.A. 6301 (M1), on Jane Doe 2

(Signature of Affiant)

TPR Katherine A Berggren # 12460

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



**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

Docket Number: <i>CR-48-19</i>	Date Filed: <i>3/19/19</i>	OTN/Live Scan Number <i>U689282-4</i>	Complaint/Incident Number <i>63-466</i>
Defendant Name:	First: <i>SAMANTHA</i>	Middle: <i>ANN</i>	Last: <i>FERGUSON</i>

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

I, \_\_\_\_\_, 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.

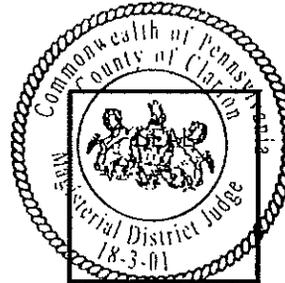
*SA S. Adams*

(Signature of Affiant)

Sworn to me and subscribed before me this 19 day of March 2019

3/19/19 Date *[Signature]*, Magisterial District Judge

My commission expires 1 of January 2024



*[Signature]*

(Signature of Affiant)

*TPR Katherine A. Bergman #12460*

COMMONWEALTH OF PENNSYLVANIA  
 COUNTY OF: CLARION  
 Magisterial District Number: 18-3-01  
 MDJ: Hon. DUANE QUINN  
 Address: 22 NORTH 6TH AVE. CLARION, PA 16214  
 Telephone: (814)226-9355



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

DEFENDANT: (NAME and ADDRESS):  
 JOSEPH J. FERGUSON  
 First Name Middle Name Last Name Gen.  
 496 SIMPSON ROAD CORSICA, PA 15829

**NCIC Extradition Code Type**

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

**DEFENDANT IDENTIFICATION INFORMATION**

Docket Number: CR-49-19    Date Filed: 3/19/19    OTN/LiveScan Number: U 689292-2    Complaint/Incident Number: 63-466    SID:    Request Lab Services?  YES  NO

GENDER:  Male  Female    DOB: 12/05/1983    POB:    Add'l DOB: / /    Co-Defendant(s):

RACE:  White  Asian  Black  Native American  Unknown

ETHNICITY:  Hispanic  Non-Hispanic  Unknown

HAIR COLOR:  GRY (Gray)  RED (Red/Aubn.)  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)

Driver License: State PA    License Number: 26630561    Expires: 12/06/2019    WEIGHT (lbs.):

DNA:  YES  NO    DNA Location:

FBI Number:    MNU Number:    Ft. HEIGHT in: 6 2

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:

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

DAG ALICIA S. WERNER    *Alicia Werner*    3/19/2019  
 (Name of the attorney for the Commonwealth)    (Signature of the attorney for the Commonwealth)    (Date)

I, STEPHEN J. ADAMETZ & KATHERINE A. BERGGREN    SPECIAL AGENT II #507, PA STATE TROOPER  
 (Name of the Affiant)    (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of PA OFFICE OF ATTORNEY GENERAL - BCI    PA0222400  
 (Identify Department or Agency Represented and Political Subdivision)    (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe  
 with violating the penal laws of the Commonwealth of Pennsylvania at [204] CLARION TWP  
 (Subdivision Code)    (Place-Political Subdivision)

in CLARION County    [16]    on or about OCTOBER 21, 2016 THROUGH OCTOBER 16, 2018  
 (County Code)    (Date)



# POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-49-19</i>	Date Filed: <i>3/19/19</i>	OTN/LiveScan Number <i>U 689292-2</i>	Complaint/Incident Number <i>63-466</i>
Defendant Name	First: <i>JOSEPH</i>	Middle: <i>J.</i>	Last: <i>FERGUSON</i>

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

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>
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<input checked="" type="checkbox"/> Lead?	<i>1</i>	<i>2903</i>	<i>C</i>	<i>of the</i>	<i>18 PA C.S.</i>	<i>2</i>	<i>F-2</i>		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: The Actor, Joseph J. Ferguson, on or about, October 21, 2016 through October 16, 2018, in the County of Clarion, Falsely Imprisoned the victim JANE DOE 1 (being under the age of 18 years of age) so as to interfere substantially with her liberty. That is to say Joseph J. Ferguson being the parent of Jane Doe 1 restrained her by handcuffing and or duct taping Jane Doe 1's hands for the purpose of punishing the victim, in violation Section 2903, Subsection (C) of PA Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input checked="" type="checkbox"/> Conspiracy <i>18 903</i>
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<input type="checkbox"/> Lead?	<i>2</i>		<i>A,1</i>	<i>of the</i>	<i>18 PA C.S.</i>	<i>1</i>	<i>F-2</i>		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: The Actor, Joseph J. Ferguson, on or about October 21, 2016 through October 16, 2018, in the county of Clarion, conspired with Samantha A. Ferguson to Falsely Imprison Jane Doe 1, being under the age of 18 years of age and the daughter of the Actors by handcuffing and or duct taping the victims hands, in front of and behind her back for punishment, in violation Section 2903, C of PA Crimes Code.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt <i>18 901 A</i>	<input type="checkbox"/> Solicitation <i>18 902 A</i>	<input type="checkbox"/> Conspiracy <i>18 903</i>
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<input type="checkbox"/> Lead?	<i>3</i>	<i>4304</i>	<i>A1</i>	<i>of the</i>	<i>18 PA C.S.</i>	<i>1</i>	<i>F-3</i>		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: The Actor, Joseph J. Ferguson, on or about, October 21, 2016 through October 16, 2018, in the county of Clarion, Endangering the Welfare of Jane Doe 1 by violating a duty of care, protection or support through a repeated course of conduct, that is to say the actor, repeatedly handcuffed and duct taped Jane Doe 1's hands inflicting pain for the purpose of punishing the victim in violation of section 4304 (a)1 of the PA Crimes Code.



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Defendant Name	First: <u>JOSEPH</u>	Middle: <u>J.</u>	Last: <u>FERGUSON</u>

- 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    .

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.)

ADAMETZ / BERGGREN

3-19-19  
(Date)

TPR Katharina Berggren 1246  
(Signature of Affiant)

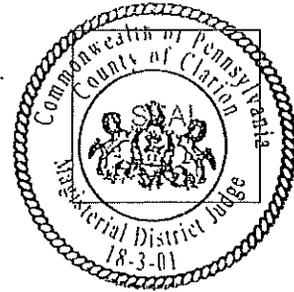
AND NOW, on this date 3/19/19

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.

18-3-01  
(Magisterial District Court Number)

[Signature]  
(Issuing Authority)





**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

<b>Docket Number:</b> CR-49-19	<b>Date Filed:</b> 3/19/19	<b>OTN/Live Scan Number</b> U689292-2	<b>Complaint/Incident Number</b> 63-466
<b>Defendant Name:</b>	<b>First:</b> JOSEPH	<b>Middle:</b> J.	<b>Last:</b> FERGUSON

**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Your Co-Affiant is, Special Agent Stephen J. Adametz from the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Western Regional Office. S.A. Adametz has approximately twenty two (22) years' criminal investigation experience as a Municipal Police Officer and currently as an agent with the Office of Attorney General. Your Affiant has made many felony arrests as a sworn Officer/Special Agent to include thefts, homicides, child and adult sex crimes. This Affiant has attended several trainings classes and is certified in Class A, Electronic Surveillance (No. A-4718).

The Co-affiant of this affidavit is Tpr. Katherine A. BERGGREN, a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of Section 5702 of the Pennsylvania Crimes Code and as such, I am empowered to make arrests for criminal offenses enumerated therein. I have been a Pennsylvania State Trooper since January 6, 2014 and I have been assigned to the Troop "C" Clarion Station, Patrol Unit since August of 2016 and the Criminal Investigations Unit since March of 2017. I have received numerous trainings to include child abuse training, rape investigation, sexual assault investigation, Reid Technique of investigative interviewing in child abuse cases, Reid Technique of investigative interviewing and interrogation, application for and service of numerous search warrants, and other numerous criminal investigative trainings. I have obtained certifications to allow for the use of Electronic Surveillance pursuant to the provisions of Chapter 57 of title 18 of the Pennsylvania Crimes Code, "Class A" certification, certification number "A-5659."

This investigation was initiated by a Pennsylvania Childline report (CWIS ID: 8326356) that was called in to Pennsylvania Child Welfare Services on October 10, 2018 at 3:30 PM. A referral was made by the Clarion County Children Youth and Families (CYF) Services to the Western Regional Office of CYF due to a conflict Clarion CYF had with the family involved. On October 23, 2018 Affiant Berggren from the Pennsylvania State Police began an investigation into this incident for endangering the welfare of the children.

On January 3, 2019 the Pennsylvania Office of Attorney General (OAG) assumed jurisdiction from Clarion County District Attorney, Mark T. Aaron pursuant to 71P.S. § 732-205(a)(3) of the Commonwealth Attorney's Act due to a conflict of interest from his office.

On October 24, 2018 your Affiant attended an interview with the juvenile victim (Jane Doe 1) at Clarion County CYF, 214 South 7<sup>th</sup> Ave, Suite B, Clarion PA., 16214. This interview included Clarion County CYF case worker Sarah Wallace (Wallace) and Rebecca Lewandowski (Lewandowski) from the Western Regional Office of CYF. Jane Doe 1 informed them that her sister (Jane Doe 2) and she live with and were adopted by Samantha Ann Ferguson, DOB, June 6, 1992 and Joseph J. Ferguson, DOB, December 5, 1983. She stated that they were two of six children in the Ferguson household (496 Simpson Road, Corsica, PA 15829) and that all six children were home schooled by Samantha Ferguson.

Tpr Katherine A Berggren #12460  
(Signature of Affiant)  
SAS Adametz



**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

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**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Jane Doe was questioned regarding the allegations of punishment that were raised in the Childline report. She informed your Affiant and others that all the siblings were disciplined for misbehavior by way of spanking with a bare hand or other items such as a wooden spoon. Jane Doe 1 stated that she was made to stand in a utility closet for her punishment. Our investigation found that this utility closet has exposed electrical wires, piping and other sensitive household hardware that could pose a danger to children left alone in this location in the dark. This punishment in the closet was done with the door both opened and closed. On one incident of discipline while she was in the closet, Samantha Ferguson caught Jane Doe 1 playing, not sitting still as instructed.

As a result of Jane Doe 1 playing during discipline, she stated that Samantha Ferguson handcuffed and or duct taped her hands in front of her or behind her back. Thereafter when she was disciplined in the utility closet, her hands were bound. When asked how many times she was punished in this fashion, Jane Doe 1 stated "*a couple of times.*" In addition to being placed in the utility closet with her hands bound, Jane Doe 1 told your Affiant that Samantha Ferguson would handcuff her hands behind her back and around a "*blue bar*" that was part of a bunk bed in a family bedroom. Jane Doe 1 advised that she would be seated on the bed with her feet straight out in front of her while cuffed to the bed post. She added that she was often bound by the handcuffs or duct tape for several hour at a time, only let out to be fed depending on the time of day.

Jane Doe 1 explained that her sister, Jane Doe 2 would sometimes handcuff her under Samantha Ferguson's direction for punishment. In these instances, if Samantha Ferguson was not around, Jane Doe 2 would be instructed to handcuff Jane Doe 1 and keep the key until she got back to the residence. Jane Doe 1 explained that when she had her hands duct taped in front of her, Samantha Ferguson would have her clasp her hands together and intertwine her fingers so her wrists could be taped together. She advised that in addition to being handcuffed in the closet and bedroom, her hands were also bound in a moving car as Samantha Ferguson drove to a local Taco Bell restaurant.

Jane Doe 1 stated that when her hands were cuffed or taped it was painful and often bruised her wrists. She added that on one occasion she was yelling out in pain to have her parents release her. Jane Doe 1 stated that her yelling prompted Samantha Ferguson to place duct tape over her mouth.

Through the course of investigation it was found that Samantha and Joseph Ferguson were made to participate in Mandated Reporting Training in order to become a foster/adoptive parent. It was further discovered that the Ferguson's stopped giving Jane Doe 1 her medication for Attention-Deficit/Hyperactivity Disorder (ADHD) and halted her in person therapy due to their religious beliefs that they could pray away Jane Doe 1's problems.

*Katherine A Bergeron #12460*  
\_\_\_\_\_  
(Signature of Affiant)  
*SA. [Signature]*



**POLICE CRIMINAL COMPLAINT  
AFFIDAVIT CONTINUATION PAGE**

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**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

Your Affiants found that in addition to making Jane Doe 2 handcuff her sister and administer punishment for them, the Ferguson's also made Jane Doe 2 serve her own punishment in the downstairs utility closet. On November 2, 2018 case workers from CYF interviewed Samantha Ferguson in her residence. In this conversation Samantha Ferguson admitted to the aforementioned methods of restraint/abuse with Jane Doe 1 and added that she placed her sister, Jane Doe 2 in a utility closet as well. At this time, Samantha Ferguson reported to CYF case workers that Jane Doe 2 was placed in the closet until she "gave her life to Jesus" and accepted the Ferguson's religion.

On Wednesday, October 24, 2018 a dependency hearing was held in the Clarion County Court of Common Pleas before the Honorable Paul H. Millin. In that hearing, Joseph J. Ferguson testified that although he was not the primary parent that administered the punishment, he knew of and agreed to the use of the handcuffs and duct tape by his wife on Jane Doe 1. Joseph also testified that he was aware that Jane Doe 1 was handcuffed to the bed between five and seven times. Furthermore, he testified that she was either taped or handcuffed in the utility closet once. Joseph went on to testify before the court, that with his blessing, Jane Doe 1 had her mouth taped shut and that on one of these occasions Jane Doe 1 was restrained in the dark.

Based on the above, your Affiants respectfully request an arrest warrant be issued for Joseph J. Ferguson (DOB, December 5, 1983) of 496 Simpson Road, Corsica, PA 15829, Clarion County for: *False Imprisonment*, 18 PA. C.S.A. 2903, C (F2), 2 counts, one for the utility closet and one for the bed room on Jane Doe 1. *Criminal Conspiracy*, 18 PA. C.S.A. 903, A1 (F2), Underlying offense of False Imprisonment, handcuffing Jane Doe 1. *Endangering the Welfare of Child*, course of conduct 18 PA. C.S.A.4304, A1 (F3), on Jane Doe 1.

TPR Katharina Berger #12460

(Signature of Affiant)



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**AFFIDAVIT of PROBABLE CAUSE CONTINUATION**

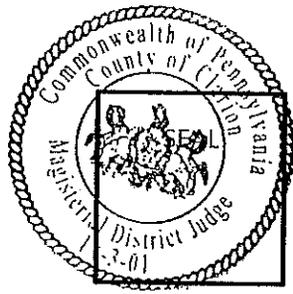
I, \_\_\_\_\_, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

*S.A. [Signature] / MR Katherine A Berggren #1246*  
(Signature of Affiant)

Sworn to me and subscribed before me this 19 day of March 2019

3/19/19 Date [Signature] Magisterial District Judge

My commission expires 1 of Jan. 2024



MR Katherine A Berggren #1246  
(Signature of Affiant)  
*[Signature]*