

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

MDJ: Hon. BETH S. MILLS  
Magisterial District Number: 05-2-26  
Address: 2611 HAYDEN BLVD.  
SUITE 3  
ELIZABETH, PA 15037  
Phone: 412.382.3050

DEFENDANT: (NAME and ADDRESS):  
TODD M MURRAY  
First Name Middle Name Last Name Gen.  
1226 SCHWEITZER ROAD, APT 106 MCKEESPORT, PA 15135

NGIC/Extradition/Code/Type							
Felony - Full Extradition							
Distance: _____							
DEFENDANT IDENTIFICATION INFORMATION							
Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number	Request Lab Services?			
19-19	3/31/19	G 834118-5	66-2516	<input type="checkbox"/> Yes			
GENDER MALE	DOB 06/11/1963	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>			
RACE WHITE	First Name		Middle Name	Last Name		Gen.	
ETHNICITY	AKA						
HAIR COLOR BRO (BROWN)				EYE COLOR BLU (BLUE)			
DNA							WEIGHT (lbs)
DNA Location		MNU NUMBER					Ft. HEIGHT (in)
FBI Number							6 00
Defendant Fingerprinted							
Fingerprint Classification							
DEFENDANT VEHICLE INFORMATION							
Plate #	State	Hazmat	Registration Sticker (MMYY)	Comm'l Veh. Ind.	School Veh.	Off. 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. See Pa.R.Crim.P. 507).

name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, PHIL LARCINESE (Name of the Affiant)	PAAG416 (PSP/MP/ETC -Assigned Affiant ID Number & Badge #)
of ATTORNEY GENERAL (Identify Department or Agency Represented and Political Subdivision)	PA0222400 (Police Agency ORI Number)
do hereby state: (check appropriate box)	
1. X 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 _____	
105 (Subdivision Code)	ELIZABETH TWP (Place-Political Subdivision)
In Allegheny County 02 (County Code)	on or about 10/31/2018 0:00

RECEIVED  
2019 MAR 31 PM 11:23  
FITTSBURGH MUNICIPAL COURT



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 834118-6	Complaint/Incident Number 58-2616
Defendant Name	First: TODD	Middle: M	Last: MURRAY

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. 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 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	5903	C1	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 5903C1 DISSEMINATION TO MINORS F3 1 COUNT									
The actor, knowingly disseminated to a minor by sale, loan or otherwise explicit sexual materials, which are obscene or any picture, photograph, drawing, sculpture, motion picture file, video tape or similar visual representation or image of a person or portion of the human body which depicts nudity, sexual conduct, or sadomasochistic abuse and which is harmful to minors, in violation of 18 Pa. C.S. §5903 (c)(1).									

<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						
	2	6301	A1II	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 6301A1II CORRUPTION OF MINORS F3 1 COUNT									
The actor, being 18 years and upwards, by any course of conduct in violation of Chapter 31 (relating to Sexual Offenses) corrupted or tended to corrupt the morals of any minor less than 18 years of age, or who aided, abetted, enticed or encouraged any such minor in the commission of an offense under Chapter 31, namely Actor sent obscene sexual materials to the purported minor, in violation of 18 Pa.C.S. §6301(a)(1) (ii).									



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 834118-5	Complaint/Incident Number 56-2516
Defendant Name	First: TODD	Middle: M	Last: MURRAY

Inchoate Offense:	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	6318	A4	of the	18	2	F3	NCIG Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description/Acts of the accused associated with this Offense:									
18 6318A4 UNLAWFUL CONTACT WITH MINOR - FELONY THREE UNDER SECTION 5903 F3 2 COUNTS									
The actor intentionally contacted a minor namely, Purported minor, 14 for the purpose of engaging in the activity of Actor was sending obscene sexual materials to the purported 14 yo female minor. In violation of 18 Pa. C.S. §6318(a)(4).									
The actor intentionally contacted a minor namely, Purported minor, 14 for the purpose of engaging in the activity of Actor was sending obscene and sexual materials to the purported 14 year old female minor in violation of 18 Pa. C.S. §6318(a)(4).									

Inchoate Offense:	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	7512	A	of the	18	1	F3	NCIG Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description/Acts of the accused associated with this Offense:									
18 7512A CRIMINAL USE OF COMMUNICATION FACILITY F3 1 COUNT									
The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, On the said dates, the Actor used a communication device to conduct unlawful contact with a purported minor., in violation of 18 Pa.C.S. § 7512.									

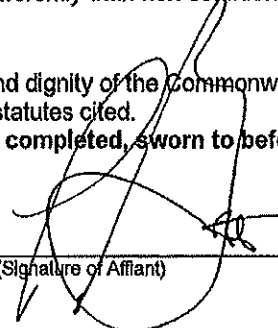


# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 834118-6	Complaint/Incident Number: 66-2516
Defendant Name	First: TODD	Middle: M	Last: MURRAY

- 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 is comprised of the preceding page(s) numbered \_\_\_\_\_ through \_\_\_\_\_
- 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.)**



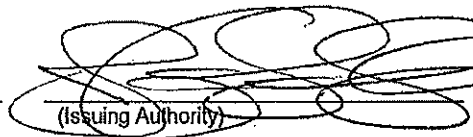
(Signature of Affiant)

\_\_\_\_\_  
 (Date)

AND NOW, on this date 3/31/19 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.

\_\_\_\_\_  
 (Magisterial District Court Number)



(Issuing Authority)

**JEFFREY L. HERBST,**  
 MAGISTERIAL DISTRICT JUDGE  
 MAGISTERIAL DISTRICT 05-2-07  
 MY COMMISSION EXPIRES ON THE  
 FIRST MONDAY IN JANUARY, 2024



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 834118-5	Complaint/Incident Number 56-2516
Defendant Name	First: TODD	Middle: M	Last: MURRAY

## AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:  
1/8/2019
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:  
10/30/2018

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):  
Police Investigation
- b) How the source of information knows this particular person committed the crime:  
Police Investigation
- c) How both Affiant and/or source of information knows that a particular crime has been committed:  
Police Investigation

3. WHAT CRIMES:

18 5903 C1 DISSEMINATION TO MINORS  
 18 6318 A4 UNLAWFUL CONTACT WITH MINOR - FELONY THREE UNDER SECTION 5903  
 18 6318 A4 UNLAWFUL CONTACT WITH MINOR - FELONY THREE UNDER SECTION 5903  
 18 6301 A1II CORRUPTION OF MINORS  
 18 7512 A CRIMINAL USE OF COMMUNICATION FACILITY

4. WHERE CRIME(S) COMMITTED:

1226 SCHWEITZER ROAD AT, 106, MCKEESPORT, PA 15135

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.  
 Source has given information in the past which has led to arrest and/or conviction  
 Defendant's reputation for criminal activity  
 This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 834118-5	Complaint/Incident Number 58-2516
Defendant Name	First: TODD	Middle: M	Last: MURRAY

Your Affiant is Special Agent Philip J. Larcinese III, with the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations, Child Predator Section, Western Regional Office. Your Affiant is a member of Pennsylvania Internet Crimes Against Children (ICAC) Task Force and Regional Computer Crimes Task Force and has been investigating internet crimes against children since 2006.

Your Affiant's duties include investigating violations of state law, such as the online exploitation of children. In particular, violations of Title 18, Section 6312, that criminalizes the possession, receipt, and transmission of child pornography and violations of Title 18, Section 6318 (b.1)[to pro-actively conduct investigations involving child predators who wish to engage in sexual activity with minors].

Your Affiant has gained experience through attending training courses and consistent work assignments that have focused on sexual offenses against children, including computer-based offenses. To date, your Affiant has actively participated in numerous state and federal investigations throughout the Commonwealth of Pennsylvania dealing with online solicitations for sexual offenses and/or attempted sexual offenses with minors in addition to unlawful contact with minors, sexual abuse of children and criminal use of communications facilities.

Your Affiant has received information from Detective Sergeant Aaron Wojtkowski of the Newbury Police Department(NPD), Newbury, Massachusetts. Your Affiant has been duly sworn to law upon my oath and say that I reasonably believe the totality of the information received from Detective Sergeant Aaron Wojtkowski to be true and correct to best of your Affiant's knowledge.

Detective Sergeant Wojtkowski has been employed by Newbury Police Department(NPD) for sixteen years and has been a police officer for a total of twenty-three years. Detective Sergeant Wojtkowski has been assigned to the Detective Division since 2006 and currently assigned to the Massachusetts Internet Crimes Against Children(ICAC) Task Force as well as being assigned as a part-time Task Force Officer(TFO) with the Federal Bureau of Investigation(FBI) Child Exploitation and Human Trafficking Task Force. Detective Sergeant Wojtkowski has received specialized training in areas of online child sexual exploitation and undercover investigations and has investigated a broad variety of criminal offenses including online sexual exploitation of children.

Detective Sergeant Wojtkowski has employed online undercover techniques in unrelated but similar cases and knows from training and experience that the internet has revolutionized the way offenders interact with and exploit children and that offenders who have a sexual interest in children will utilize the internet because of the anonymity it provides. That sexual exploitation of minors can in some cases but not all include solicitation of illicit images and the solicitation for sexual contact. Relevant to this investigation, the use of the internet and social media related to the sexual exploitation of minors is common. Detective Sergeant Wojtkowski has personally been involved in other unrelated but similar investigations involving the use of "Messenger Apps". Those cases involve both the actual exploitation of minors and officer(s) acting in an undercover capacity. The information provided by Detective Sergeant Wojtkowski is as follows:

This investigation involves an adult male who is known as TODD M. MURRAY (DOB: 6/11/63), hereinafter the Actor, who is known to utilize the following Facebook account and cellular number:

Facebook: "Todd Murray"  
 Facebook URL: <https://www.facebook.com/todd.murray.1217>  
 Cellular Number: 412-526-8223

The Actor is alleged to have had unlawful contacts via a communication facility with a purported female minor who resides in Newbury, Massachusetts for the purpose of enticing the purported minor for prohibited/unlawful sexual activity:



**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 834118-6	Complaint/Incident Number 56-2516
Defendant Name	First: TODD	Middle: M	Last: MURRAY

In this investigation, Detective Sergeant Wojtkowski used a communication facility and assumed the undercover identity of a female minor located in the state of Massachusetts while in the course of performing his official duties. Specifically, Detective Sergeant Wojtkowski assumed the undercover identity and characteristics of a fourteen (14) year old female child, known by a confidential name and identity to your Affiant and Detective Sergeant Wojtkowski.

On October 30, 2018 while acting in an undercover capacity(UC) a person utilizing a Facebook account "Todd Murray" sent a "friend request" to Detective Sergeant Wojtkowski's UC account. On October 31, 2018 "Todd Murray" sent an unsolicited message to the UC account. Based on Detective Sergeant Wojtkowski's training and experience the conversation is consistent with offenders who groom underage victims over the internet for sexual conduct.

The Facebook URL is: <https://www.facebook.com/todd.murray.1217>

The Actor indicated that he was from Pennsylvania.

Based on the chats and the publicly available information the Actor is employed as a school bus driver and has potential access to children.

The messages quickly turned sexual and the Actor indicated that he would have to take a "road trip" to see the UC.

The Actor also indicated that if the UC was closer he would come get the UC for illicit sexual conduct.

The Actor sent a digital image of a female performing oral sex on a male. The Actor claimed the image was a sixteen (16) year old female who lived in his apartment complex "sucking him".

The Actor sent a second digital image of what appears to be the same female. The subject depicted in the image is completely nude. The Actor indicated when asked that the female allowed him to take the images of her, furthermore that she loved it.

During the course of my investigation Detective Sergeant Wojtkowski obtained an administrative subpoena seeking relevant information from the aforementioned Facebook account.

Facebook responded to this subpoena and provided the following "verified" phone number associated with the account: 412-526-8223. This is the same phone number provided to the UC by the Actor.

Please Note: The process of verifying a phone number typically means that the user provides his/her phone number to the social media company who in turn provides a unique code for the user to enter. Once the user receives the unique code he/she provides it to the company.

Using records available to law enforcement Detective Sergeant Wojtkowski learned that the aforementioned phone number is ported to AT&T.

Detective Sergeant Wojtkowski obtained an additional administrative subpoena requesting subscriber information from AT&T relevant to the aforementioned phone number.

On December 4, 2018 Detective Sergeant Wojtkowski received information from Cricket Wireless that the wireless subscriber information is: Todd Murray 1331 Washington Blvd, Apt #6, McKeesport PA.



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Please Note: Cricket Wireless utilizes AT&T's wireless network

Over diverse dates between October 31, 2018 and December 30, 2018 the Actor sent a series of unsolicited messages to the UC. These messages continued to suggest the Actor's sexual interest in the UC.

The Actor described specific sexual acts he wished to perform on the UC, furthermore solicited sexual conduct with the UC, a person the Actor believed was fourteen years of age.

During the chats the Actor provided his phone number: 412-526-8223 to the UC.

Please Note: This number matches the verified phone number provided by Facebook.

During the chats Murray provided digital images of his vehicle, a maroon Ford Explorer to the UC.

Using records available to law enforcement Detective Sergeant Wojtkowski learned that the Actor has a 2003 Ford Explorer bearing PA tag # JVY3469 registered to him. This is vehicle is consistent with the images sent by the Actor.

Detective Sergeant Wojtkowski obtained a Pennsylvania driver's license image of Todd M. Murray; 319 San Juan Dr. Apt #2, DOB 6/11/1963. Detective Sergeant Wojtkowski compared the PA driver's license image to the image found on the Initial Facebook account and believes that they are the same person.

Detective Sergeant Wojtkowski also captured an additional Facebook profile of "Todd Murray" (2nd profile) created by the Actor in a private Facebook group "Younger Girls Who Want to Date Older Men". That profile image also appears to match the PA driver's license image of Todd M. Murray.

The Actor suggested that he would travel to Massachusetts on or about December 22, 2018 to meet up with the UC for sexual conduct.

The Actor indicated that he would get a motel.

At or about December 19, 2018 the Actor sent messages from a separate account. The Actor indicated that because of his financial situation he would not be able to travel to Massachusetts. Both accounts to date have been flagged by Facebook.

On December 28, 2018 Detective Sergeant Wojtkowski received a message from a third Facebook account being used by the Actor. That account name was "Michael Murray". That account was also flagged by Facebook.

Your Affiant reviewed Detective Sergeant Wojtkowski's UC chats with the Actor. Based on your Affiants training and experience the chats are sexual in nature and consistent with offenders who groom underage victims over the internet for the solicitation of illicit images and the solicitation for sexual contact. Furthermore the Actor discussed with the purported fourteen (14) year old female child his desire to travel and meet the child to perform sexual acts.

Your Affiant confirms that the Actor did in fact send the purported fourteen (14) year old female child, two images of obscene sexual material.

The first image is that of a young female performing oral sex on an erect penis. The Actor told the purported fourteen (14) year old female child that the image was of a (16) year old female that lived in his apartment complex "sucking him".





# POLICE CRIMINAL COMPLAINT

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The second image is that of the same alleged (16) year old female completely naked in a shower. The Actor told the purported fourteen (14) year old female child that the alleged (16) year old female allowed him to photograph her.

Based on the totality of the foregoing information, circumstances and reasonable inferences to be drawn therefrom, your Affiant submits that there is probable cause for the filing of this criminal complaint charging the Actor, TODD M. MURRAY (DOB: 6/11/83) an adult male, with the following felony offences:

Charge 1 Unlawful Contact with a Minor  
18 Pa. C.S. §6318(a)(4) Third Degree Felony (2 counts)

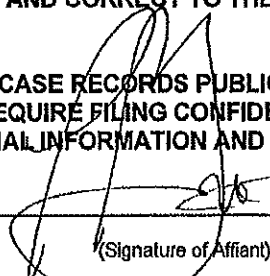
Charge 2 Obscene and other Sexual Materials and Performances  
18 Pa. C.S. §5903(c)(1) Third Degree Felony (2 counts)

Charge 3 Corruption of Minors  
18 Pa. C.S. §6301(a)(1)(ii) Third Degree Felony (1 count)

Charge 4 Criminal Use of a Communication Facility  
18 Pa. C.S. §7512(a) Third Degree Felony (1 count)

I, PHIL LARCINESE, 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 31 day of MAR, 2019

\_\_\_\_\_  
Date \_\_\_\_\_  
\_\_\_\_\_  
Magisterial District Judge

My commission expires first Monday of January,

**JEFFREY L HERBST,**  
MAGISTERIAL DISTRICT JUDGE  
MAGISTERIAL DISTRICT 052-07  
MY COMMISSION EXPIRES ON THE  
FIRST MONDAY IN JANUARY, 2024