COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: CAMBRIA **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 47-1-02 VS. MDJ: Hon. SUSAN GINDLESPERGER (NAME and ADDRESS): Address: *701 BELMONT STREET **AARON GILLIN** Gen First Name Middle Name Last Name JOHNSTOWN, PA 15904 532 SUMMIT AVE JOHNSTOWN, PA 15905 Telephone: (814)266-1066 **NCIC Extradition Code Type** ☐ 5-Felony Pending Extradition □ 1-Felony Full ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number **Date Filed** Complaint/Incident Number Request Lab Services? OTN/LiveScan Number ☐ YES ☒ NO FR/1 9 2019 IF-2018-0172 GENDER ров 03/10/1975 ров Ра Co-Defendant(s) Add'I DOB Male Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE White ■ ☐ Asian Black Unknown Native American Hispanic Unknown **ETHNICITY** Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) ☐ PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) ☐ MUL (Multicolored) DNA **DNA Location** ☐ YES ☒ NO WEIGHT (lbs.) **FBI Number MNU Number** 240 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. **Fingerprint Classification:** DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. mat Ind. Plate # same as Sticker (MM/YY) 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). KARA COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SA JAMES KOPERA 438 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as

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

(Subdivision Code)

on or about MAY 7, 2018, AND DATES THEREAFTER

in CAMBRIA County

15905

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [413]

(County Code)

[11]

532 Summit Ave. Johnstown, Pa

(Place-Political Subdivision)



Docket Number	er:	Date File	ed:	0.	ΓN/LiveScan			Cor	mplaint/Incident N 2018-0172	Number
Defendant Nai	me'	First:			Middle:			Last:	2010-0172	
The acts com When there is (Set forth a brief	mitted by a more that summary of not sufficier ctim at the t	an one offer the facts suff nt. In a summa ime of the offe	nse, each c ficient to advis ary case, you i ense may be i	offense shape the defermant of the defer	nould be nun idant of the name ie specific sect inown. In additi	nbered ture of the ion(s) and ion, socia	Assemb chronolo e offense(s d subsection	ogically. s) charged. A on(s) of the numbers an	A citation to the state statute(s) or ordinan d financial information	ated, if appropriate. ute(s) allegedly violated, uce(s) allegedly violated. on (e.g. PINs) should not
	Attempt 18 901 A		Solicitation 18 902 A		Conspiracy 8 903		200		of Victims Age 60 o	r Older
⊠ 1	4117		A 2	of the	18		1	F-3		
Lead? Offense	Se	ction	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT D	CONTRACTOR OF THE PARTY OF THE	Accident Numb	per			☐ Ir	terstate		☐ Safety Zone	☐ Work Zone
material to the in documents were	surance clai	m, namely, the le Actor in ord	e Actor preser	nted docum	ents to Nationy	wide Insu	rance Com ompany.	pany for rei	nformation concernir mbursement of lost v	wages , when in fact, the
				WALES #5579.5				1		
Lead? Offens	3922	Section	A 1 Subsection	of the	18 PA Statute	(Title)	1 Counts	F-3	NCIC Offense Co	ode UCR/NIBRS Code
PennDOT (if applica	Data	Accident Number				`	Interstate		☐ Safety Zone	☐ Work Zone
of Theft by Decep	cused ass tion, any ac	ociated with t that constitu ompany, the A	h this Offer ted a substan ctor presente	nse: On or tial step too d documen	about May 7, 2 vard the comn ts to Nationwid	2018 and nission of e Insuran	dates there that crime ace Compa	eafter,the A	ctor did, with the into	ent to commit the crime n in excess of \$2,000.00 ges, when in fact, the
Inchoate Offense	☐ Attempt		Solicitation 18 902 A		onspiracy 8 903		Numbe	er of Victim	s Age 60 or Older	
□ 3	4101		A 3	of the	18		1	M-1		
Lead? Offens PennDOT	Data	Accident	Subsection		PA Statute (Counts Interstate	Grade	NCIC Offense Co ☐ Safety Zone	Dide UCR/NIBRS Code Work Zone
Nationwide Insura	otion (incl cused ass	ociated with	n this Offen writing that the	ise: On or e Actor kne	about May 7, 2 w to be forged,	018 and	in support	of a claim f	er, the Actor, with the	ctor submitted
documents to Nati complete and/or a				ntitiement t	o benefits purp	ortedly a	utnorized	by Pete Burr	ns, when in fact, Pete	e Burns did not

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0172
Defendant Name:	First: AARON	Middle:	Last: GILLIN

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.

5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents. The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.) (Date) I certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed before a warrant can be issued. (Magisterial District Court Number) SEAL	4. This complaint consis	ts of the preceding page(s) i	tumbered <u>I</u> tmodgir <u>J</u> .	
of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.) (Date) AND NOW, on this date FEB 1 3 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)	System of Pennsylvan	ia that require filing confiden	of the Case Records Public Access Policy of the itial information and documents differently that no	<i>Unified Judicial</i> n-confidential
AND NOW, on this date FEB 1 3 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)	of Pennsylvania and wer (Before a warrant of arr	re contrary to the Act(s) of the rest can be issued, an affice	e Assembly, or in violation of the statutes cited.	
AND NOW, on this date FEB 1 3 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. #47-1-0 (Magisterial District Court Number) I certify that the complaint has been properly completed and verified.	issuing authority, and a	attached.)		1,
AND NOW, on this date FEB 1 3 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. ##47-1-03 (Magisterial District Court Number) I certify that the complaint has been properly completed and verified before a warrant can be issued.				15000 11
An affidavit of probable cause must be completed before a warrant can be issued. ##47-1-0 (Magisterial District Court Number) (Issuing Authority)		(Date)	(Signature	of Affiant)
(Magisterial District Court Number) Suban M. Mydlegunge (Issuing Authority)	AND NOW, on this date	FEB 1 3 2019	I certify that the complaint has been properly co	mpleted and verified
	An affidavit of probable cau	se must be completed before a	warrant can be issued.	
	#47-1-0) (Magisterial District Court N	umber) (Is	Man M. Undleypinger	SEAL

Docket Number:

Date Filed:

OTN/LiveScan Number

IF-2018-0172

Defendant Name:

AARON

OTN/LiveScan Number

IF-2018-0172

Complaint/Incident Number

IF-2018-0172

Complaint/Incident Number

IF-2018-0172

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

May 7, 2018 and dates thereafter

Criminal Complaint No:

IF-2018-0172

Name of Affiant:

Special Agent James Kopera

Insurance Fraud Section
Western Regional Office
564 Forbes Avenue
Pittsburgh, PA

Law Enforcement Agency: Pennsylvania Office of Attorney General

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since April 2007, is the case agent assigned to the investigation involving the Actor, Aaron R. Gillin.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Tom McMahon of Nationwide Insurance Company. The investigation revealed that the Actor, Aaron R. Gillin, filed a claim with Nationwide Insurance Company on or about May 7, 2018. The Actor provided documents to Nationwide Insurance Company for lost wages purportedly signed by Pete Burns. The documents indicated that the Actor lost wages due to injuries received in a vehicle accident. Two documents that were provided to Nationwide Insurance Company by the Actor were forged with the signature of Pete Burns in order to have Nationwide Insurance Company pay the Actor for lost wages. The amount of attempted theft is \$26,400.00.
- C. Your Affiant reviewed the claim filed with Nationwide Insurance Company and spoke to Tom McMahon, Special Investigator with Nationwide Insurance Company, and found the following:
 - 1. On March 14, 2018, the Actor was a passenger in a Nationwide Insurance Company insured vehicle being operated by Andrew Goldberg. The vehicle was struck by another vehicle at the intersection of Hickory and Oak St. in the City of Johnstown.
 - 2. As a result of the accident, the Actor received injuries requiring medical treatment. The Actor was transported from the accident scene by ambulance to Conemaugh Hospital.
 - 3. The Actor filed a claim through Nationwide Insurance Company indicating that he had lost wages for construction jobs that he was unable to complete as a result of his injuries sustained in the vehicle accident.
 - 4. The Actor provided Nationwide Insurance Company with two forged documents on or about May 7, 2018. The documents were construction billing proposals purportedly written to Pete Burns for work to be completed at a rental property located at 115 Moyer Street owned by Burns. The two proposals totaled \$26,400.00.



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	First:	Middle:	Last:
Defendant Name:	AARON	R	GILLIN

5. Pete Burns reviewed the documents and verified that his signature on the documents were forged and that he does not own a rental property located at 115 Moyer St., Johnstown, Pa.

D. Pete Burns provided the following information to your Affiant:

- 1. Burns verified that he did hire the Actor to do work on a rental property he owns on or about March-April 2018. Burns confirmed that he signed a contract with the Actor for work to be done at 531 Maple Ave., Johnstown, Pa. Burns stated that he did not sign any contracts with the Actor for work at 115 Moyer St. Johnstown. Any signature of his on those contracts would have been forged.
- 2. Burns also recalled that he did write a statement, signed it and had it notarized that he did contract with the Actor for him to perform work on his rental property located at 531 Maple Ave. Johnstown, Pa. Due to the Actor being in an automobile accident, he was unable to do the work and Burns had to hire another contractor to do the work.
- 3. Burns reviewed the documents that the Actor submitted as part of his claim:
 - i. When reviewing the documents, Burns stated that the actual address he owns is not Moyer St, but 315 Boyer St. in Johnstown. He would not have signed a document for work on a property he does not own. Burns never had the Actor perform any work at his 315 Boyer Street address.
 - ii. The first document Burns reviewed was a notarized letter dated 4/30/18 stating that he hired the Actor to do work on his rental property at 531 Maple Ave. Burns stated that the document was legitimate and that due to the vehicle accident the Actor was involved in, he could not perform any of the work. He obtained another contractor to complete the work. The total proposal from the Actor was \$5,800.00. The Second document is the proposal from the Actor to Burns for work to be done at 531 Maple Ave. Burns stated that this proposal was authentic and that the Actor was unable to do the work due to his injuries from an auto accident and that he hired another contractor to do the work. The total proposal from the Actor was \$5,800.00.
 - iii. The third document Burns reviewed was a proposal from the Actor to Burns stating that he was going to do work at Burns' 115 Moyer St. rental property for \$10,400.00. Burns stated that the document is fraudulent, his signature is forged and he does not own a property at that address.
 - iv. The fourth document Burns reviewed was a proposal from the Actor to Burns stating that he was going to do work at Burns' 115 Moyer St. rental property for \$16,000.00. Burns stated that the document is fraudulent, his signature is forged and he does not own property at that address.
- E. Andrew Goldberg provided the following information to your Affiant:



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	First:	Middle:	Last:
Defendant Name:	AARON	R	GILLIN

- 1. Goldberg stated that in March of 2018 he was driving his 2007 Pontiac G5 on Hickory St. in Johnstown, Pa. His front seat passenger was his sisters' boyfriend, the Actor. He stated that at the intersection of Hickory and Oak St. his vehicle was struck by another vehicle causing damage to the passenger side of his vehicle. He stated that he received a broken nose and injuries to his right foot. He stated that he recalled the Actor hurt his right leg.
- F. Your Affiant re-interviewed Tom McMahon, Special Investigator with Nationwide Insurance Company, and found the following:
 - 1. The Actor was entitled to \$5,300.00 from Nationwide for the work at 531 Maple Ave. that he was unable to do because of the injury.
 - 2. Nationwide would have paid \$26,400.00 based upon the other two documents if they had not determined that they were fraudulent.
 - 3. The Actor was not paid the \$5,300.00 because of the material misrepresentation with the other two documents during the claim.

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Aaron Gillin.

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

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

Sworn to me and subscribed before me this day of FEB 1 3 2019

Date Duran M. Mundlebyengt , Magisterial District Judge

My commission expires first Monday of January, 707 4.

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: ERIE COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 06-1-04 VS. MDJ: Hon. Paul Bizzarro DEFENDANT: (NAME and ADDRESS): Address: 460 East 26th Street **AMHED AL-OURAISHI** Erie, PA 16504 First Name Middle Name Last Name 379 East 37th Street Telephone: (814)451-6522 Erie, PA 16504 NCIG Extradition Code Type 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services? _R -OB 2 /13/19 4678458-0 ☐ YES ☐ NO IF-2018-0211 GENDER ров 03/23/1989 ров Ра Add'l DOB Co-Defendant(s) Male · First Name Middle Name Last Name Gen. ☐ Female AKA RACE White Hispanic Asian 🗌 Black Native American Unknown ETHNICITY ■ Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color GRN (Green) PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) Eye BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA **DNA Location** ☐ YES ☒ NO WEIGHT (lbs.) FBI Number 3V1DMAD5M MNU Number 185 Defendant Fingerprinted ☐ YES ☒ NO Ft. HEIGHT In. Fingerprint Classification: 5 2 DEFENDANT VEHICLE INFORMATION State Comm'l Veh. Haz Registration School Veh. Oth. NCIC Veh. Code Reg. Plate #JHV1984 mat PA Sticker (MM/YY) 07/19 same as П Def. VIN Year Make Model Style Color \boxtimes WBAVC9354K038515 2008 Bmw 328xi 4d Gold Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa,R.Crim.P. 507). SDAG KARA COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SPECIAL AGENT DAVID A. DALCAMO 457 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. ☐ I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ 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 [302] 379 East 37th Street, Erie, PA 16504 Subdivision Code) (Place-Political Subdivision) in ERIE County [25] on or about AUGUST 8, 2018 AND VARIOUS DATES THEREAFTER (County Code)

Docket Number: CR - 80-19	Date Filed:	OTN/LiveScan Number U 678258-0	POLICE CRIMINAL COMPLAIN Complaint/Incident Number IF-2018-0211
Defendant Name:	First:	Middle:	Last:
	AMHED	AM	AL-QURAISHI
When there is more that	an one offense, each c	offense should be numbered chro	embly or statute allegedly violated, if appropriate
When there is more that (Set forth a brief summary of without more, is not sufficier The age of the victim at the t	AN ONE Offense, each of the facts sufficient to advi- nt. In a summary case, you lime of the offense may be i	offense should be numbered chrose the defendant of the nature of the offer must cite the specific section(s) and sub-	nologically. nse(s) charged. A citation to the statute(s) allegedly violate section(s) of the statute(s) or ordinance(s) allegedly violate with numbers and financial information (e.g. PINs) should a

Inchoate	☐ Attempt	☐ Solicitation	☐ Conspiracy			
Offense-	18 901 A	18 902 A	18 903		Number of Victims Age 60	or Older
	4117	(a)(2)	The 18 PA C.S.		F-3	
Lead?	ense Section	Subsection	PA Statute (Title)	Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDO (if appli		Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
Statute De	scription (include th	ne name of statute	or ordinance): INSURA	NCE FRAUD		
Acts of the	accused associate	nd with this Offense	a'			
On or about A	ugust 8, 2018 and vario	ous dates thereafter, th	ne Actor did knowingly and	with the intent	to defraud an insurer or self-ir	nsured, namely. Nationwic
nsurance cor	iliparty, presented of ca	use to de presentea to	Nationwide Insurance Com	nany any state:	ment forming a part of or in su e insurance claim, namely, the	innort of any incurance of
nsurance cor	npany that his venicle s	sustained damage to th	e passenger side, following	material to the an accident on	e insurance claim, namely, the August 8, 2018, when in fact,	: Actor told Nationwide : the damage had occurre
ionths earlie	in another accident, p	rior to the Actor purcha	sing the vehicle.		•	-
Inchoate		☐ Solicitation	☐ Conspiracy	Numbe	er of Victims Age 60 or Olde	<u> </u>
Offense	18 901 A	18 902 A	18 903	Numbe	er or victims Age 60 or Olde	
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Lead? Of	fense# Section	Subsection	PA Statute (Title	2 5 5 1 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Grade NCIC Offense	Code UCR/NIBRS Cod
PennD0 (if appl		dent nber		☐ Interstate		☐ Work Zone
		Contract Con	or ordinance); crimi n	AL ATTEMPT	THEFT BY DECEPTION	
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cts of the	accused associate	d with this Offense	:			
n or about Ai	ugust 8, 2018 and date:	s thereafter, the Actor	did with the intent to comm	nit the crime of	Theft By Deception any act th	at constituted a substanti
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Docket Number: CR - 80 - 19	Date Filed: 국 / /3/ / 9	OTN/LiveScan No	Imber Complaint/Incident Number 8 - 0 IF-2018-0211
56440	First:	Middle:	Last:
Defendant Name:	AMHED	AM	AL-QURAISHI

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date) (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.

(Magisterial District Court Number)

(Issuing Authority)



Docket Number:
CR - 80 - 19
Defendant Name:
Date Filed:
OTN/LiveScan Number
CR - 80 - 19
Defendant Name:

Date Filed:
OTN/LiveScan Number
IF-2018-0211

Last:
AMHED
AM
AL-QURAISHI

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

August 8, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent David A. Dalcamo

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 1251 Waterfront Place

Pittsburgh, PA

- A. Your Affiant, who has been employed as a Special Agent for the Pennsylvania Office Attorney General, Insurance Fraud Section, Western Regional Office, since February 2016, and has been a Police Officer in this Commonwealth since 1998, is the case agent assigned to the investigation involving the Actor, Ahmed Al-Quraishi.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Shahita Foster, of Nationwide Insurance Company. The investigation revealed that the Actor, Ahmed Al-Quraishi, filed a claim for damage to his vehicle that he alleged occurred on August 8, 2018. It was determined that the damage that he claimed occurred on August 8, 2018 had actually occurred prior to the Actor purchasing the vehicle. The amount of the attempted theft was approximately \$2,680.10.
- C. Your Affiant reviewed the claim filed with Nationwide Insurance Company and spoke to Shahita Foster, Special Investigator with Nationwide Insurance Company, and found the following:
 - 1. On August 9, 2018 the Actor, Ahmed Al-Quraishi, filed a claim with Nationwide Insurance Company on his automobile policy. The Actor stated that on August 8, 2018, at or around 9:30 pm, his 2008 BMW 328xi was damaged while it was parked at the Dollar Tree. The Actor claimed his vehicle was a victim of a hit and run accident and that there was damage to the passenger side of the vehicle.
 - 2. On August 9, 2018, Nationwide Insurance Company conducted a recorded statement with the Actor. During the recorded statement the Actor stated that his vehicle was damaged while parked and unattended in the parking lot at the Dollar Tree on August 8, 2018, around 9:30 pm.
 - 3. Nationwide Insurance Company reviewed the claim history on the vehicle and found that the previous owner of the vehicle, who was also insured by Nationwide Insurance Company, filed a claim on June 10, 2018 with the same or similar damage.
 - 4. Nationwide Insurance Company interviewed the previous owner on August 10, 2018. Through this interview, it was found that the damage was never repaired and that the vehicle was sold to the Actor with the damage to the front passenger side and rear passenger side.
 - 5. Nationwide Insurance Company inspected the vehicle on June 29, 2018. Photographs were taken and the total damage was estimated at \$2,702.81.
 - 6. On August 13, 2017, Nationwide Insurance Company inspected the vehicle with the Actor present Plant graphs were taken and the total damage was estimated at \$2,680.10.
 - 7. Shahita Foster conducted a recorded interview with the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Actor on August 15, 2018. During the Interview the Int

302 2/13/19



Docket Number: CR - 80-19	Date Filed: ⊋ //3/ /4	OTN/LiveScan Number U 678358-0	Complaint/Incident Number IF-2018-0211
	First:	Middle:	Last:
Defendant Name:	AMHED	AM	AL-QURAISHI

Actor with the previous loss filed by the previous owner, at which time the Actor stated that he wished to withdraw the claim.

- D. Your Affiant and Special Agent Bradley Capan conducted an interview with Rodger Sutton, who provided the following information:
 - 1. Sutton was advised of the investigation and agreed to answer questions concerning the 2008 BMW 328xi.
 - 2. Sutton stated that he and his wife were the registered owners of the vehicle, however it was operated by his son Jacob Sutton.
 - 3. Sutton stated that in June of 2018 his son had the vehicle when it was hit and run by another vehicle causing damage to the passenger side.
 - 4. Sutton filed a claim on his Nationwide Insurance Company automobile policy and took the vehicle to Hallman Collison Center to have it inspected.
 - 5. Sutton stated that he received payment from Nationwide Insurance Company, but chose not to have the vehicle repaired.
 - 6. In late July 2018 his son, Jacob, sold the vehicle to his boss' brother. Sutton stated that the Actor purchased the vehicle.
 - 7. Your Affiant asked Sutton if the Actor was aware of the damage when he purchased the vehicle. Sutton stated that he and his son advised both the Actor and the Actor's brother of the damage.
 - 8. Sutton further stated, based on the extent of damage to the passenger side of the vehicle, he feels there was no way the Actor could have not known about the damage.
 - 9. Sutton stated that when his son was transferring the title for the vehicle, the Actor was \$250.00 short and still owes them the funds. He has contacted that Actor numerous times, but never received the payment.
- E. Your Affiant and Special Agent Bradley Capan conducted an interview with Rick Bafik, Appraiser, Hallman Champion Collision Center, who provided the following information:
 - Bafik was advised of the investigation and stated that he knew the Actor from past dealing with him concerning other vehicles.
 - 2. Bafik stated that the Actor would regularly bring in damaged vehicles for estimates, but never had any of the vehicles repaired.
 - 3. Bafik stated that on June 29, 2018, he inspected and prepared an estimate for Rodger Sutton on his 2008 BMW for Nationwide Insurance Company.
 - 4. Your Affiant had Bafik review the estimate and photographs prepared by Nationwide Insurance Company on August 13, 2018 for the Actor.
 - 5. Bafik stated that the damage claimed by the Actor is identical to the damage that was present inspected the vehicle on June 29, 2018 for Rodger Sutton.
 - 6. Bafik also referred to the photographs that he had taken on June 29, 2018, and again confirmed the damage was the same.

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2/13/18 Page 2 of L



Docket Number: CR - 80 - 19	Date Filed: 국 //3/ / 9	OTN/LiveScan Number	Complaint/Incident Number
Defendant Name:	First:	Middle:	Last:
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7. Bafik supplied copies of the estimate he prepared and the associated photographs.

- F. Your Affiant and Special Agent Bradley Capan conducted an interview with Detective Tom Gray, City of Erie Police Department, who provided the following information:
 - 1. Detective Gray was able to locate a police report from the Erie Police Department database involving the Actor.
 - 2. The report was filed by the Actor on August 9, 2018 at 12:43 pm.
 - 3. The Actor claimed the his vehicle was hit and run in the parking lot of the Dollar Tree at 379 East 37th Street, Erie, PA on August 8, 2018 at 9:20 pm.
 - 4. The Actor completed a Citizens Crash Receipt, police department document.
- G. Your Affiant and Special Agent Bradley Capan conducted an interview with the Actor at the Law Office of Eric Hackwelder, who provided the following information:
 - 1. The Actor and his attorney, Eric Hackwelder, were advised of the investigation and agreed the Actor would answer questions concerning the Nationwide Insurance Company claim filed by the Actor.
 - 2. The Actor stated that he did file a claim with Nationwide Insurance Company on August 8, 2018, involving damage to his 2008 BMW 328 XI.
 - 3. The Actor admitted that the damage reported in this claim was present at the time he purchased the vehicle on July 31, 2018.
 - 4. The Actor admitted that he lied to the insurance company when he filed the accident claim with the intent to have Nationwide Insurance Company pay to repair the damage.
 - 5. The Actor agreed that on two occasions he told Nationwide Insurance Company that he was hit and run in the parking lot at a Dollar Tree in Erie, PA, when in fact the accident never occurred.
 - 6. The Actor stated that on August 15, 2018, when Nationwide Insurance Company advised him the vehicle had been previously damaged in a loss on June 10, 2018, he advised Nationwide Insurance Company that he no longer wanted to pursue the claim. The Actor stated that he realized that Nationwide Insurance knew he was lying.
 - 7. The Actor indicated that when he communicated with Nationwide Insurance Company, he did so from his residence at 379 East 37th Street, Erie, Pennsylvania.

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Ahmed Al-Quraishi.

SA County County

05-1-02

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
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I, SPECIAL AGENT DAVID A. DALCAMO, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

	7	St Dent a	2-13-1
		(Signature of	Affiant)
Sworn to me and subscribed before me this $\frac{13}{2}$	day of	February	2019
My commission expires first Monday of January, 2020		, Magisterial Disi	trict Judge

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: Hon. TOM SWAN

Magisterial District Number: 05-3-04 Address: 2060 SAXONBURG BLVD

GIBSONIA, PA 15044

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

ALAN

(NAME and ADDRESS): TALARICO

Gen.

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	FEB 2 0 701	G 831040-0	IF-2018-0292
Defendant Name	First: ALAN	Middle:	Last: TALARICO

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.)

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AOPC 412A - Rev. 09/08

18 Pa. C.S. §3922.



		OTN/LiveScan Number	Complaint/Incident Number
	FEB 2 0 2019	G 831040-0	IF-2018-0292
Defendant Name	First: ALAN	Middle:	Last: TALARICO

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Docket Number:		OTN/LiveScan Number	Complaint/Incident Number
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Defendant Name	First: ALAN	Middle:	Last: TALARICO

- 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 is comprised of the preceding page(s) numbered through
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently 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.)

(Date)

AND NOW, on this date

(Date)

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

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

HONORABLE TOM SWAN

DISTRICT COURT 05-3-04

(Magisterial Marie Court Namber 1044

(Issuing Authority)



Docket Number:	Date Filed: OT	N/LiveScan Number	Complaint/Incident Number
	LEB I A MAR GE	331040-0	IF-2018-0292
Defendant Name	First: ALAN	Middle:	Last: TALARICO

AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

a) Date when Affiant received information:

01__/_01_/_2019___

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

12__/17__/_2018___

2. HOW:

a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):

Based on reliable information received

b) How the source of information knows this particular person committed the crime:

based on reliable information received

 How both Affiant and/or source of information knows that a particular crime has been committed: based on reliable information received

3. WHAT CRIMES:

18 4117 A2 INSURANCE FRAUD 18 3922 A1 THEFT BY DECEPTION

18 4101 A3 FORGERY

4. WHERE CRIME(S) COMMITTED:

ALLEGHENY COUNTY

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

Affiant and/or other Police Officers corroborated details of the information



Docket Number:		veScan Number	Complaint/Incident Number	
	FED 2 0 2016 8310	40-0	IF-2018-0292	19 Jan 19
Defendant Name	First: ALAN	Middle:	Last: TALARICO	

Date of Violation:

March 20, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Jason Chimile

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

1251 Waterfront Place Mezzanine Level

Pittsburgh, PA 15222

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since October 2015, is the case agent assigned to the investigation involving the Actor, Alan Talarico.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Tammy Sexson of Merit Life Insurance. The investigation revealed that the Actor obtained a loan effective May 12, 2017 with Merit Life Insurance affiliate, OneMain Financial (OMF), located in Robinson Township, Pa. The loan that the Actor purchased had credit, accident, and health insurance (A&H), which was underwritten by Merit Life Insurance (Merit). In the event of a covered disability, Merit Life Insurance would cover the Actor's monthly loan payment up to the term of his loan, which was May 15, 2021.

A claim was submitted on or about February 9, 2018, with claim forms submitted after that date alleging a continued disability. At the time of the claim, the Actor was working at Foreign Traffic, Import sales and service. Merit Life paid the Actor benefits through July 31, 2018. In August 2018 Merit discovered that many of the forms submitted by the Actor purportedly signed by his doctor and employer to verify his continued disability through September 3, 2018 were fraudulent, not being completed, prepared or authorized by them. In fact, the Actor returned to partial duty work on March 5, 2018 and full duty on April 1, 2018.

The amount of theft is approximately \$1,250.75 which are the benefits paid by Merit Life Insurance for the time period March 31, 2018 through July 31, 2018.

C. Your Affiant reviewed the claim filed with Merit Life Insurance and found the following:

The Actor obtained a loan on May 12, 2018 through OneMain Financial, located at 5888 Steubenville Pike, Suite 1, Robinson Township PA 15136. When the Actor obtained the loan he also purchased credit, accident, and health insurance on the loan, underwritten by Merit Life Insurance. In the event of a covered disability, Merit Life insurance would cover the Actor's monthly loan payments up to the term of his loan which was May 15, 2021.

On February 9, 2018 Merit received an A&H claim from the Actor, including a form from Lisa Karlik, Controller/Office Manager at the Actor's employer, Foreign Traffic, stating the Actor's last date worked due to disability was January 12, 2018. The claim was approved and a benefit payment of \$325.40 was made to OMF on behalf of the Actor, covering the period from January 23, 2018 thru February 23, 2018.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
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Defendant Name	First: ALAN	Middle:	Last: TALARICO

After February 9, 2018 the Actor submitted numerous other forms purportedly prepared by his doctor and/or employer for the purpose of extending his disability. Based upon these claim forms, Merit life Insurance issued benefits covering the disability from January 23, 2018 thru July 31, 2018. The forms submitted included the following:

- --received March 20, 2018/dated March 12, 2018, signed by Dr. Lawrence Notaro, extending disability to a date to be determined;
- --received March 20, 2018/dated March 12, 2018, signed by Lisa Karlík, stating the Actor's last date worked was January 12, 2018;
- --received March 30, 2018/dated March 30, 2018, signed by Dr. Lawrence Notaro, extending disability through April 30, 2018; --received April 2, 2018/dated March 30, 2018, signed by Dr. Lawrence Notaro, extending disability through April 30, 2018;
- --received April 2, 2018/dated April 2, 2018, signed by Lisa Karlik, stating the Actor's last date worked was January 12, 2018; --received May 2, 2018/dated April 30, 2018, signed by Dr. Lawrence Notaro, extending disability through July 31, 2018;
- --received May 2, 2018/dated May 2, 2018, signed by Lisa Karlik, stating the Actor's last date worked was January 12, 2018; --received August 3, 2018/dated August 1, 2018, signed by Dr. Lawrence Notaro, extending disability through September 3, 2018;
- --received August 3, 2018/dated August 2, 2018, signed by Lisa Karlik, stating the Actor's last date worked was January 12, 2018;

On the claim form received by Merit on August 3, 2018, Merit noticed that the doctor's signature did not appear to be the same as on previous claim forms. Merit Life Insurance then sent a verification request to Dr. Notaro with the claim forms containing his purported signatures.

Dr. Notaro replied that he only completed and signed the form dated March 30, 2018. Any other forms were completed and/or submitted without his knowledge or authority. Dr. Notaro verified he had seen the Actor only one time and verified his disability thru May 1, 2018.

Merit also sent a verification request to the Actor's employer, Foreign Traffic Inc. Lisa Karlik replied to Merit Life Insurance's request and informed them that she only completed the form submitted in February 2018. Any other forms were completed and/or submitted without her knowledge or authority. Karlik stated that the Actor returned to partial duty work on March 5, 2018 and full duty on April 1, 2018.

- \$1,250.75 in benefits were paid by Merit Life Insurance for the time period March 31, 2018 through July 31, 2018.
- D. Your Affiant, along with Special Agent William McKee, interviewed Dr. Lawrence Notaro at his office located in Sewickley, PA. Notaro provided the following information:
- 1. Notaro was asked if he could provide your Affiant with information as to when he had the Actor as a patient, when he was seen, and the forms that he had filled out in regards to the Actor's disability claim.
- 2. Notaro advised that for extra work he works at the Sewickley Valley Hospital every 6th weekend admitting and discharging patients from the emergency room, and that is when he first had patient contact with the Actor. Notaro advised that the Actor was in the hospital for a back injury from January 31, 2018 until February 20, 2018.
- 3. Notaro advised that he discharged the Actor on February 20, 2018 and on February 22, 2018 the Actor came to his office located at 100 Hazel Lane, Suite 201, Sewickley, Pa. Notaro advised that the Actor was at his office looking for pain medication because of the back surgery that he had received.



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Defendant Name	First: ALAN	Middle:	Last: TALARICO

- Notaro stated that a few weeks later the Actor sent disability forms for him to fill out for insurance purposes.
- 5. Notaro was provided copies of the medical disability forms that were provided by Merit Life Insurance Company and was asked to verify their accuracy.
- 6. Notaro advised that he completed the disability form with the date of March 30, 2018 which indicated the Actor should be off work from January 23, 2018 until May 1, 2018 on it, and his office personnel faxed it to Merit Life Insurance. According to Notaro, the disability forms dated March 12, 2018, April 30, 2018, and August 1, 2018 were not completed by him.
- 7. Notaro stated that someone from Merit Life Insurance contacted him about the disability claim forms and asked him if he had completed the other forms and dated them. Notaro stated "no".
- 8. Notaro advised that at one point he spoke to the Actor on the phone about the suspicious disability claim forms that were filled out. Notaro advised the Actor that someone was forging his name on the disability claim forms. Notaro stated that the Actor said "sorry" and nothing else was said.
- E. Your Affiant, along with Special Agent William McKee, interviewed Lisa Karlik at Foreign Traffic, located at 4813 Rt. 8, Allison Park, Pa. Karlik provided the following information:
- Karlik is the accounting and finance manager at Foreign Traffic.
- 2. Karlik was asked if she could provide work information for the Actor.
- 3. Karlik advised that the Actor worked at Foreign Traffic as a Mechanic from October 28, 2013 until November 9, 2018.
- 4. Karlik advised that the Actor was off work for an injury, but his injury did not occur at Foreign Traffic.
- 5. Karlik stated that the Actor was off work from January, 2018 until he returned in March, 2018. Karlik advised that prior to the Actor's injury he was working approximately 30 to 35 hours a week (flat rate). When paid flat rate, the Actor was only paid for hours that he was actively working, rather than merely being at the shop. Karlik advised that the Actor came back to work on March 5, 2018 and worked approximately 30-35 hours a week. For the Actor's light duty he was paid for the hours he was there. On April 1, 2018 he returned to normal full duty, at which time he was paid his flat rate again.
- 6. Karlik was asked about the work disability forms that the Actor provided for her to fill out.
- 7. Karlik advised that the Actor provided her with the disability form and asked her to fill it out. Karlik stated that the Actor told her the form was because he was not able to work, and if she filled out the form the loan would be taken care of while he was off.
- 8. Karlik advised that someone named Tammy from Merit Life Insurance sent her a form to fill out to verify if she had been the one completing the disability forms that were being sent in to them.
- 9. Karlik advised that she had completed only one disability form for the Actor and the rest had been forged. Karlik advised that the form from February 2018 is the only form that she had completed.
- 10. Karlik was shown the work disability forms that Merit Life Insurance provided to you Affiant. Karlik advised that she did not fill out the forms dated March 12, 2018, April 2, 2018, May 2, 2018 and August 2, 2018.



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- 11. Karlik advised that she confronted the Actor about the forged disability forms. Karlik advised that the Actor did not really say anything when she confronted him as to why or how the forms were forged.
- 12. Karlik stated that some of the employees that worked in the back with the Actor notified her that he was faxing disability forms to the insurance company.
- 13. Karlik advised that the Actor's last day of work before injury was January 12, 2018 and the last check he received was on February 7, 2018, for which he was paid using 36 hours of his vacation.
- 14. Karlik stated that the Actor did not work in February because the owner, David, gave him an advance on his vacation and sick time.
- F. Your Affiant, along with Special Agent William McKee, interviewed Charles Pavlik Jr. at OneMain Financial, located at 5888 Steubenville Pike Suite 1, Robinson Township Pa. Pavlik provided the following information:
- 1. Pavlik is a Personal Loan Specialist at OneMain Financial.
- 2. Pavlik was asked to provide information on the loan that the Actor obtained through them.
- 3. Pavlik advised that the Actor came to OneMain Financial for a personal loan with collateral on May 12, 2017.
- 4. Pavlik advised that when the Actor took out the personal loan he also obtained insurance on the loan through Merit Life Insurance. Pavlik advised that the insurance could be used if the Actor was injured and could not pay on the loan. Pavlik stated that Merit Life Insurance would then pay for the Actor's loan payments.
- 5. Pavlik stated that as long as the Actor had a doctor fill out the one disability form and his employer fill out the other form and send them in to Merit Life Insurance the loan would be paid for, for the term of his loan.
- G. Your Affiant interviewed Tammy Sexson. Sexson provided the following information:
- 1. Sexson is a special investigator at Merit Life Insurance.
- 2. Sexson was asked if the Actor had to be totally disabled for Merit Life Insurance to pay for the Actor's loan payments.
- 3. Sexson advised that Merit Life Insurance would pay the loan payments on the Actor's loan if he was back to work on partial work duty, but they would only pay partial work duty for up to a period of 12 months. Sexson advised that after a period of 12 months Merit Life Insurance would stop paying the Actor's loan payments unless the doctor stated he would have to be on full disability.
- 4. Sexson stated that the flex hours that the Actor worked would not have mattered. Sexson stated that as long as the Actor was working his normal work duties on a normal daily basis, the hours that he worked on a job would not matter. Sexson advised that if they knew the Actor was working his normal work duties, flex hours or not, they would not have been paying for his loan payments.
- 5. According to Sexson, the Actor was paid from January to July of 2018, and he received \$1,932.06 total. Sexson stated that



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the Actor deserved \$681.31 for the time he was off work and the time he was working light duty. Sexson advised that the Actor was overpaid \$1,250.75.

- 6. Sexson stated that they found out about the forged disability claim forms when they called the doctor office to verify a date on one of the claim forms. Sexson stated that one of the clerical staff at the doctor office stated that the doctor was not in the office on the date that the form was signed.
- 7. Sexson advised that the Actor was faxing the disability claim forms to them from Foreign Traffic (#724-449-9966) based upon the fax notations at the top of several of the forms.

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COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ALLEGHENY
Magisterial District Number: 05-2-07
MDJ: Hon. Jeffrey L. Herbst
Address: Parkway Building - Suite 1500
339 Old Haymaker Road
Monroeville, PA 15146
Telephone: (412)372-1125



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

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oran a mode of survivors and party									
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PennDOT Data (if applicable)	Accident Number —			Interstate	[☐ Safety Zone	☐ Work Zone		
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Lead? Offense#		2.0000000000000000000000000000000000000	Statute (Title)	Counts	Grade	NCIC Offense C	ode UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number			Interstate		☐ Safety Zone	☐ Work Zone		
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Acts of the accused ass On or about July 5, 2018 and substantial step toward the c vehicle was involved in a hit a the policy.	l various dates thereaf ommission of that crin	ter, the Actor did with the ne in an attempt to obtain	In excess of \$2,	000.00 fro	m Progressiv	e Insurance, name	elv, the Actor stated her		



Docket Number:	Date Filed: 03/29/2019	OTN/LiveScan Number G833701-1	Complaint/Incident Number IF-2018-0233	
505-04-00-00-00-00-00-00-00-00-00-00-00-00-	First:	Middle:	Last:	
Defendant Name:	BEATRICE	LAILA	ELIAS-AUSI	

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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.)

	MARCH 29, 2019	Allowhile
	Date)	(Signature of Affiant)
AND NOW, on this date 3/29/	/ / G I certi	fy that the complaint has been properly completed and verified.
An affidavit of probable cause must be comple	ted before a warrant can	be issued.
の5・ク・0つ (Magisterial District Court Number)	(Issuing Autho	JEFFREY L. HERBST, MAGISTERIAL DISTRICT JUDGE MAGISTERIAL DISTRICT 05-2-07 MY COMMISSION EXPIRES ON THE FIRST MONDAY IN JANUARY, 2024

 Docket Number:
 Date Filed:
 OTN/LiveScan Number
 Complaint/Incident Number

 03/29/2019
 G833701-1
 IF-2018-0233

 Defendant Name:
 First:
 Middle:
 Last:

 BEATRICE
 LAILA
 ELIAS-AUSI

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

July 5, 2018 and various dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Bradley Capan

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 1251 Waterfront Place Pittsburgh, PA 15222

- A. Your Affiant, Bradley Capan, is employed as a Special Agent with the Pennsylvania Office of Attorney General and is currently assigned to the Bureau of Criminal Investigations, Insurance Fraud Section. Your Affiant has over 15 years of combined law enforcement experience as a Special Agent and Police Officer within the Commonwealth of Pennsylvania and the Commonwealth of Virginia.
- B. This investigation was initiated by the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office based upon a referral of information by Katie Thomas, an investigator for Progressive Insurance. The investigation revealed that the Actor, Beatrice Laila Elias-Ausi, obtained a Progressive Insurance policy on February 14, 2018 at 10:09 PM which became effective on February 16, 2018. On July 5, 2018, the Actor filed a claim with Progressive Insurance stating that her vehicle was involved in a hit and run accident on July 3, 2018 while parked in Monroeville, Pennsylvania. The Actor submitted photographs depicting the damage to her vehicle to Progressive Insurance and an analysis of those photographs indicated that they were taken on February 13, 2018, prior to the inception of the policy. The amount of attempted theft is approximately \$2,601.47.
- C. Your affiant spoke with Katie Thomas, an investigator for Progressive Insurance. She provided the following information:
 - 1. On February 14, 2018, the Actor obtained a Progressive Insurance policy on her 2016 Mazda 3 that became effective on February 16, 2018. The Actor was advised her policy would take effect on February 16, 2018 to coincide with when her previous GEICO insurance policy lapsed.
 - 2. On July 5, 2018, the Actor contacted Progressive Insurance and filed a claim stating that her vehicle had been involved in a hit and run accident on July 3, 2018 while parked in Monroeville, Pennsylvania.
 - 3. The Actor claimed damage that included the entire passenger side of the vehicle including the front headlight, front bumper, front quarter panel, front door, rear door, rear quarter panel, and rear bumper.
 - 4. Progressive Insurance conducted an estimate on the damage to the vehicle and determined the cost of repairs would be \$3,601.47. Less the Actor's \$1,000.00 deductible, Progressive Insurance would have been required to pay \$2,601.47 to repair the vehicle.



Docket Number:	Date Filed: 03/29/2019	OTN/LiveScan Number G833701-1	Complaint/Incident Number IF-2018-0233
	First:	Middle:	Last:
Defendant Name:	BEATRICE	LAILA	ELIAS-AUSI

- 5. Thomas analyzed photographs submitted by the Actor depicting the damage to the passenger side front of her vehicle and those photographs were determined to have been taken on February 13, 2018, prior to her policy inception.
- 6. Thomas obtained an image from a license plate reader (LPR) depicting the rear of the Actor's vehicle parked in Monroeville, Pennsylvania. The image was dated February 13, 2018 at 3:24 PM and damage on the passenger side rear bumper is visible on the vehicle. However, Thomas could not determine who captured the original photograph.
- D. Your Affiant went to A.L. Recovery located at 3150 Leechburg Road, Pittsburgh, PA 15239 and spoke with owner Michael Pletz. He provided the following information:
 - 1. A.L. Recovery is a towing business that specializes in financial institution repossessions of vehicles that are delinquent on their loan payments. Repossessions are the only form of towing performed by A.L. Recovery.
 - 2. Pletz operates five vehicles with an LPR system and those vehicles are in operation in the Greater Pittsburgh area about 20 hours per day. The data from the LPR system is uploaded to DRN, which is a company in Texas.
 - 3. Pletz was able to confirm through his account representative at DRN that the photograph depicting the Actor's 2016 Mazda 3 with Pennsylvania registration JVW-3768 that was dated February 13, 2018 at 3:24 PM was an accurate representation of their records.
 - 4. According to Pletz, the photograph taken on February 13, 2018 at 3:24 PM was taken by his company, A.L. Recovery.
- E. Your Affiant reviewed a recorded telephone call from July 5, 2018, at 12:40 PM, where the Actor contacted Progressive Insurance and spoke with Yvette Lahham to file an accident claim. The following information was learned:
 - 1. When asked when the accident occurred the Actor stated "It was July 3, 2018".
 - 2. When asked what time she discovered the damage the Actor stated "Around, like six seven PM".
 - 3. The Actor stated that while parked at Monroeville Mall in Monroeville, Pennsylvania she discovered her vehicle was struck by an unknown vehicle.
- F. Your Affiant reviewed a recorded telephone call where the Actor spoke with Shannon Halverstadt from Progressive Insurance. The following information was learned:
 - 1. When asked by Halverstadt who took the photographs that were submitted to Progressive Insurance the Actor replied "me".



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	03/29/2019	G833701-1	IF-2018-0233
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Defendant Name:	BEATRICE	LAILA	ELIAS-AUSI

- 2. Halverstadt asked the Actor "We had that you had discovered this on, uh, July the 3rd of this year?" and she replied "yes".
- G. Your Affiant requested the Pennsylvania Office of Attorney General, Computer Forensics Unit, analyze the photographs the Actor submitted to Progressive Insurance. Special Agent Michael Mihalko conducted the analysis and learned the following:
 - 1. The first image was a .JPG file titled, "Correspondence_SubmittedPhoto_74.jpg" and depicts accident damage on the front passenger side headlight and bumper. The image metadata indicated that it was taken on February 13, 2018, at 17:30:00 hours.
 - 2. The second image was a .JPG file titled, "Correspondence_SubmittedPhoto_75.jpg" and depicts accident damage on the front passenger side headlight, bumper, quarter panel, and tire. The image metadata indicated that it was taken on February 13, 2018, at 17:35:53 hours.
 - 3. The third image was a .JPG file titled, "Correspondence_SubmittedPhoto_76.jpg" and depicts accident damage on the front passenger side headlight, bumper, quarter panel, and tire. The image metadata indicated that it was taken on February 13, 2018, at 17:38:56 hours.
 - 4. The fourth image was a .JPG file titled, "Correspondence_SubmittedPhoto_77.jpg" and depicts accident damage on the front passenger side headlight, bumper, quarter panel, and tire. The image metadata indicated that it was taken on February 13, 2018, at 17:38:50 hours.
 - 5. The EXIF data GPS coordinates indicated that all of the images were taken in the Giant Eagle parking lot located at 4010 Monroeville Boulevard, Monroeville, Pennsylvania 15146.
- H. Your Affiant went to Lens Crafters located at 370 Mall Circle Drive, Monroeville, PA 15146 and spoke with manager Katelyn Frings. She provided the following information:
 - 1. The Actor was employed at this location up until sometime in July 2018 and then completed an internal transfer to one of their locations in Florida upon moving.
 - 2. Frings stated that on February 7, 2018 while travelling to work she was involved in an accident in her vehicle. According to Frings, she recalled that the Actor's accident was within a week of hers and was not on July 3, 2018.
 - 3. Frings was not aware of any other accident the Actor's vehicle was involved in.
 - 4. After the Actor moved to Florida in July 2018, the Actor contacted Frings via text message and requested that Frings write the Actor a letter stating her accident was in July 2018. Frings declined this request.

Based upon the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the issuance of an arrest warrant for the Actor, Beatrice Laila Elias-Ausi.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
·	03/29/2019	G833701-1	IF-2018-0233
	First:	Middle:	Last:
Defendant Name:	BEATRICE	LAILA	ELIAS-AUSI

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

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

Sworn to me and subscribed before me this

Date

Date

My commission expires first Monday of January,

IEFFREY L. HERBST,

MAGISTERIAL DISTRICT JUDGE MAGISTERIAL DISTRICT 05-2-07 MY COMMISSION EXPIRES ON THE FIRST MONDAY IN JANUARY, 2024

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: Hon. JAMES J HANLEY, JR. Magisterial District Number: 05-2-36 Address: 4371 MURRAY AVENUE LOWER LEVEL REAR PITTSBURGH, PA 15217

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

CHANTEL

(NAME and ADDRESS): HAYDEN

Gen.

Last Name First Name Middle Name 1313 MILL STREET DITTSBURGH DA 15221

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name of the attorney	ior ine Co	mmonweaith)		(Signati	ure of the attorney for th	e Commonwe	alin)	(Date)	· · · · · ·		
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(Name of the A	ffiant)					(PSP/MPC	ETC -Assig	ned Affiant I	D Number &	Badge	#	
of ATTORNEY	GENE	RAL				PA022240	0					
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In Allegheny	/ Count	У	02 (County (on or abo	out 06/2	5/2018	12:00			



Docket Number:	Date Filed:	OTN/LiveScan Number G 833219-2		Complaint/Incident Number
Defendant Name	First: CHANTEL	1	Middle;	Last: HAYDEN

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.)

	Inchoate Attempt Offense 18 901 A			1 1	Solicitation 18 902 A			Conspiracy 18 903		
X	1	3922	A1	of the	18	1.1	F3		9	
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
(if	inDOT Data applicable)	Accident Number		osistad	with this Office		y Zone	□Work	Zone	
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					erty, namely, Mo			e greater than		
\$2,00	JU belonging to	o Sentry Insi	urance by de	ception,	in violation of, 1	8 Pa. C.S	. §3922.			

Inchoate			<u> </u> ;	Solicitation 18 902 A			Conspiracy 18 903		
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Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nDOT Data applicable)	Accident Number	<u> </u>			☐ Safet	y Zone	☐ Work	Zone
Statute	e Description	/Acts of the	accused ass	ociated	with this Offens	se:			

18 4117A2 INSURANCE FRAUD F3 1 COUNT

The actor, knowingly and with the intent to defraud an insurer or self-insured, namely Sentry Insurance, presented or caused to be presented to an insurer or self-insured a statement forming a part of, or in support of, an insurance claim that contained false, incomplete or misleading information concerning a fact or thing material to an insurance claim, namely the Actor filed a comprehensive coverage claim stating that her vehicle was involved in an accident after hitting a deer, when in fact, the accident did not occur as a result of the Actor hitting a deer with her vehicle, and the Actor"s comprehensive policy would not have provided coverage for the accident., in violation of 18 Pa.C.S.§4117(a)(2).



Docket Number:	Date Filed:	OTN/LiveScan Number G 833219-2		Complaint/Incident Number IF-2018-0266
Defendant Name	First: CHANTEL		Middle:	Last: HAYDEN

- 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 is comprised of the preceding page(s) numbered through
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently 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.)

Mach 21, 2019

(Signature of Affiant)

(Date)

AND NOW, on this date Mach 21, 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.

05-9-36 (Magisterial District Court Number)

(Issuing Authority)



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number		
		G 833219-2	IF-2018-0266		
	First: CHANTEL	Middle:	Last: HAYDEN		

AFFIDAVIT of PROBABLE CAUSE

1. <u>WHEN:</u>

a) Date when Affiant received information:

12__/20__/_2018___

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

11__/20__/2018___

2. HOW:

a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
 Information received from reliable source

b) How the source of information knows this particular person committed the crime:

information received from reliable source

c) How both Affiant and/or source of information knows that a particular crime has been committed: based on investigation and information received

3. WHAT CRIMES:

18 4117 A2 INSURANCE FRAUD 18 3922 A1 THEFT BY DECEPTION

4. WHERE CRIME(S) COMMITTED:

ALLEGHENY COUNTY

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

Affiant and/or other Police Officers corroborated details of the information



Docket Number:	Date Filed:	OTN/LiveScan Number G 833219-2	Complaint/Incident Number	
Defendant Name	First:	Middle:	IF-2018-0266 Last: HAYDEN	

Date of Violation:

June 25, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Jason Chimile

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

1251 Waterfront Place Mezzanine Level Pittsburgh, PA 15222

A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since October 2015, is the case agent assigned to the investigation involving the Actor, Chantel Hayden.

- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Jason Dunn, Special Investigator with Sentry Insurance. The investigation revealed that the Actor had a Sentry Insurance policy on her 2003 Chevy Impala with comprehensive coverage only that started on May 9, 2018. According to Jason Dunn, the Actor's comprehensive policy would cover her vehicle for theft, vandalism, fire, natural disasters, falling objects, and damage done to her vehicle caused by an animal. The Actor contacted Sentry Insurance on June 25, 2018 at 5:17 P.M and reported that she struck a deer and then drove into a guardrail on June 12, 2018. The Actor's damages were paid under her Sentry comprehensive insurance policy because the Actor stated she hit a deer. Sentry Insurance paid for the damages to her vehicle on July 27, 2018 based on the statements the Actor made that indicated that she struck a deer and hit a guard rail causing damage to her vehicle. Sentry Insurance received a subrogation demand from Nationwide Insurance on September 14, 2018 at 10:16 A.M., which included a police report. The police report from the Pittsburgh Police Department indicated that the Actor was involved in an accident on June 12, 2018 while DUI. The report indicated that the Actor swerved into a guardrail and then drove onto property located at 676 Baldwin Road, Pittsburgh, Pa., causing damage to retaining walls located on the property. There was no mention of a deer involved in the accident report, or indication of a deer causing the Actor's vehicle to swerve off the roadway. Dunn stated that if Sentry Insurance had known the actual cause of the accident, they would not have paid for the damages to her vehicle or the property located at 676 Baldwin Road. The amount of theft is \$5,534.50.
- C. Your Affiant reviewed the claim filed with Sentry Insurance and found the following:
- 1. The Actor incepted a comprehensive only insurance policy with Sentry Insurance on May 9, 2018. The Actor reported the accident to Sentry Insurance on June 25, 2018 at 5:17 P.M.
- 2. The Actor advised Sentry Insurance that on June 12, 2018 she was coming around a bend when she hit a deer, and then subsequently sideswiped a guard rail,
- 3. On September 14, 2018 Sentry Insurance received a subrogation demand from Nationwide Insurance, the insurance carrier for property owner, Sherry Hoover, which included a police report. The police report indicated that the Actor was driving her vehicle under the influence (DUI) when she drove into a guard rail, and then drove into the homeowner's, Sherry Hoover's, driveway, causing damage to her brick retaining walls. There was no indication of the Actor striking a deer in the police report.



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		G 833219-2		IF-2018-0266
Defendant Name	First: CHANTEL	•	Middle:	Last: HAYDEN

- 4. Sentry Insurance paid for damages to the Actor's vehicle which totaled \$2,394, her impound fee of \$100.00, the guard rail which was \$587.50, and the damage to Hoover's property that totaled \$2,453.00.
- 5. According to Jason Dunn, Special Investigator for Sentry Insurance, they paid for damages to the Actor's vehicle on July 27, 2018, and the Hoover's property damage on November 8, 2018. Dunn stated that they would not have paid for the Actor's vehicle or the damages to the retaining wall on the Hoover property if they would have known the accident was not a result of the Actor's vehicle striking a deer.
- D. On Tuesday, January 15, 2019, your Affiant, along with Special Agent William McKee interviewed Justin Hoover at his residence, located at 676 Baldwin Road, Pittsburgh, PA. Hoover provided the following information:
- 1. Hoover was asked if he was home on June 12, 2018 when a vehicle being driven by the Actor drove onto his property causing damage to the retaining wall in the front of his residence.
- 2. Hoover advised that his mother is the owner of the residence, but he was at home on the night of the incident.
- 3. Hoover indicated that a vehicle crashed into their yard at approximately 11:30 P.M. and destroyed the retaining wall on both sides of their driveway.
- 4. When Hoover heard the crash he went outside to see what had happened.
- 5. Hoover observed a female standing outside a black Chevy Impala bearing the license plate # KVH9023.
- 6. The female seemed very intoxicated and became very aggressive toward him so he called the police.
- 7. The police arrived and Hoover had no further communication with the driver of the vehicle.
- 8. Hoover was shown photos of the vehicle and asked to verify if it was the same vehicle that drove into the retaining walls in the front of his residence. Hoover verified the vehicle as being the vehicle that was being driven by the Actor and drove into the retaining walls.
- 9. Hoover was asked if the Actor said anything to him about hitting a deer as the reason that she crashed her vehicle. Hoover stated that the Actor did not say anything about a deer. According to Hoover, the Actor appeared to be clearly intoxicated and that is why he believed that she crashed her vehicle.
- E. On Tuesday, January 15, 2019, your Affiant, along with Special Agent William McKee, interviewed the Actor at her residence. The Actor provided the following information:
- 1. The Actor was asked about the accident that she was involved in on the evening of June 12, 2018.
- 2. The Actor stated that it was raining and she lost control of her vehicle. The Actor stated that she crashed into a guard rail and then into the retaining walls in the front yard of the Hoover residence.
- 3. The Actor was asked what she told Sentry Insurance as to the cause of the accident.
- 4. The Actor advised that she purchased her insurance over the phone through Sentry Insurance's under carrier, Viking



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		G 833219-2		JF-2018-0266
Defendant Name			Middle:	Last: HAYDEN

Insurance.

- 5. The Actor advised that she obtained the Sentry Insurance policy on May 9, 2018 and she could only afford comprehensive insurance coverage. The Actor stated that she was paying approximately \$165.00 a month for comprehensive insurance and would have had to pay over \$300.00 a month for full comprehensive and collision coverage insurance.
- 6. The Actor advised that she lied to Sentry Insurance when she told them that she hit a deer and crashed into the guard rail.
- 7. The Actor admitted that there was no deer involved in the crash and she acknowledged being intoxicated at the time of the incident.
- 8. The Actor stated that she knew that if she told them that she hit a deer the damage to her vehicle would be covered under her comprehensive insurance policy.
- 9. The Actor admitted to lying to Sentry Insurance about the cause of the accident so the damages to her vehicle would be paid. The Actor asked what she needed to do to make it right.
- F. On Friday, January 18, 2019, your Affiant, along with Special Agent William McKee, interviewed Officer Steven Crichley. Crichley provided the following information:
- 1. Crichley was provided a copy of the police accident report that he completed on June 12, 2018 and asked if he could verify it, and provide any details on the incident.
- 2. Crichley advised that the police crash report was accurate.
- 3. Crichley stated that the driver of the vehicle, the Actor, was highly intoxicated when the accident occurred.
- 4. Crichley advised that the Actor drove into a guardrail and then crashed into brick retaining walls at the residence located at 676 Baldwin Road, Pittsburgh, Pa.
- 5. Crichley was asked if the Actor mentioned anything about a deer causing her to veer off the road and crash her vehicle. Crichley stated "no".
- 6. Crichley was asked if there was any evidence of the Actor hitting a deer at the scene of the accident and he stated "no".



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		G 833219-2		IF-2018-0266
Defendant Name	First: CHANTEL		Middle:	Last: HAYDEN

I, JASON CHIMILE , 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.

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: WASHINGTON **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 27-2-01 VS. DEFENDANT: (NAME and ADDRESS): MDJ: Hon. DAVID W. MARK Address: 68 EAST PIKE STREET YARBROUGH **ELIJAH HAZEKI** First Name Middle Name Last Name Gen CANONSBURG, PA 15317 345 NORTH JOHNSON ROAD, HOUSTON, PA 15342 Telephone: (724)745-5754 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Complaint/Incident Number Request Lab Services? Date Filed OTN/LiveScan Number ☐ YES ☐ NO 1042887 IF2018-0272 Co-Defendant(s) **GENDER** ров 03/08/1996 Add'l DOB Middle Name Last Name Gen. Male Male First Name ☐ Female **AKA** Unknown RACE ☐ White ☐ Asian ☑ Black ■ Native American Unknown ETHNICITY Hispanic ■ Non-Hispanic PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) ☐ BLU (Blue) Hair PNK (Pink) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) BLK (Black) Color ☐ BLN (Blonde / Strawberry) GRY (Gray) ☐ BLU (Blue) BRO (Brown) GRN (Green) BLK (Black) Eye ☐ HAZ (Hazel) PNK (Pink) Color MAR (Maroon) XXX (Unknown) ☐ MUL (Multicolored) DNA ☐ YES ☒ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** Defendant Fingerprinted ☐ YES Ft. HEIGHT In. Fingerprint Classification: 6 1 **DEFENDANT VEHICLE INFORMATION** Comm'l Veh. School Veh. Oth, NCIC Veh, Code State Reg. Haz Registration Ind. same as mat Plate # Sticker (MM/YY) \Box Def. VIN 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). SDAG DENNIS KISTLER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) I. WILLIAM MCKEE (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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

(Subdivision Code)

on or about NOVEMBER 4, 2018 AND DATES THEREAFTER

AODC 4128 Pour 7/10

in WASHINGTON County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [419]

(County Code)

1631

AOPC 412A - Rev. 7/18

14342

Page 1 of

345 N. Johnson Rd., Houston, Pa

(Place-Political Subdivision)

Las.

,							i	A P	OLIC	E CRIMINAL	COMPLAINT
Docket Nur	nber:	Date F] , ,, ,		N/LiveScar	n Numbe	r		omplaint/Incident N	umber
W-139	-19		719	MOC	1988	7-6				-2018-0272	
Defendant	Namo:	First:			I .	Middle:			.ast:		
Defendant	Mairio.	ELIJAH				HAZEKI			ARBR	OUGH	
When ther (Set forth a b without more	e is more the summary to the summary the summary the summary the summary the sufficient the summary th	nan one off of the facts si lent. In a sumi	ense, e ufficient mary cas	each offe to advise se, you mu av be incl	ense sho the defend st cite the uded if kn	ould be nu dant of the na specific sec lown. In addi	mbered ature of th tion(s) and tion, socia	chronologe offense(s) d subsection of security n	gically. charge n(s) of the umbers	d. A citation to the statut ne statute(s) or ordinand and financial information	te(s) allegedly violated, te(s) allegedly violated.
Inchoate Offense	☐ Attempt		☐ Solici			onspiracy 903			Numbe	er of Victims Age 60 or	Older
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Lead? Off	ense	Section	Subse	<u>-7 (3)</u>	garaga et e	PA Statute	1	Counts	Grad	NCIC Offense Code	UCR/NIBRS Code
PennDC	# OT Data	Accident Nu	mher				· · · · · · · · · · · · · · · · · · ·	nterstate		☐ Safety Zone	☐ Work Zone
(if appl	icable) escription (i			of etatute	or ordi	nance): TA					
Statute De	escubrion (II	iciude tile	nanie (u statutt	o oral	папо с). 11	DVIANUE	LINNUD			
namely, the accident prio	or in support of any insurance claim, that contained false, incomplete, or misleading information concerning any fact or thing material to the insurance claim, namely, the Actor stated that he was involved in a vehicle accident after purchasing his Progressive Insurance policy, when in fact, he was involved in the accident prior to purchasing the insurance policy, in an effort to have the damages paid by Progressive. Inchoate Attempt Solicitation Conspiracy Number of Victims Age 60 or Older										
Offense	18 90	1 A	18 9	02 A	18	3 903					
	39	22	(a)	(1)	of the	18 PA C	C.S.	1	M-1		
	Offense#	Section		bsection		PA Statut	te (Title)	Counts	Gra	nde NCIC Offense Co	ode UCR/NIBRS Code
	OT Data licable)	Accider Numbe	1] Interstate		☐ Safety Zone	☐ Work Zone
Statute De	scription (i					-				TBY DECEPTION fter,the Actor did, with t	he intent to commit the
amount less	han \$2,000.0	0 from Progre	ssive Ins	surance, th	ne Actor st	tated that he	was invol	ved in a vel	nicle acci	namely, in an attempt to dent after purchasing his ve the damages paid by	s Progressive Auto
Inchoate Offense	18 90		☐ Soli 18 9	citation 02 A		onspiracy 8 903		Numbe	er of Vic	tims Age 60 or Older	
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	Offense#	Section	7	bsection		PA Statu	te (Title)	Counts	Gra		
	OT Data blicable)	Accider Numbe] Interstate		☐ Safety Zone	☐ Work Zone
	scription (i	nclude the	name (of statute	e or ordi	nance):					
Acts of the	accused a	ssociated v	with thi	s Offens	se:						

Docket Number:		TN/LiveScan Number 387-し	Complaint/Incident Number IF2018-0272
Defendant Name:	First:	Middle:	Last:
	ELIJAH	HAZEKI	YARBROUGH

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

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

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

3-28-19

27-2-01

AND NOW, on this date

(Magisterial District Court Number)



Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number IF2018-0272

Defendant Name: First: Middle: Last: YARBROUGH

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

November 4, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent William McKee

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since February 2006, is the case agent assigned to the investigation involving the Actor, Elijah Yarbrough.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Brandt Salnick of Progressive Insurance (Progressive). The investigation revealed that the Actor was involved in an auto accident when he struck a deer on November 4, 2018, while operating his 2002 Ford Explorer. The vehicle sustained damage to the left side fender, lights, wheel and the driver door would not open. The vehicle only had liability coverage through Progressive at time of the accident. Shortly after the accident on November 4, 2018, the Actor added comprehensive/collision coverage to the Progressive policy. The Actor provided false/fraudulent information to Progressive during the claim process that he was involved in the accident after he added the comprehensive/collision coverage on the Progressive auto policy in order to have Progressive pay for the damages. The amount of the attempted theft was less than \$2,000.00.
- C. Your Affiant reviewed the claim filed with Progressive Insurance and found the following:
 - 1. On November 4, 2018, the Actor was the listed driver on his mother's (Brenda Lacks) Progressive policy. The policy only had liability coverage.
 - 2. On November 4, 2018, 2018 at approximately 10:59 PM the Actor telephoned Progressive and reported that he struck a deer while operating his 2002 Ford Explorer near the BP gas station in Canonsburg, PA. The Actor's girlfriend, Stephanie Laurick, was a passenger in the vehicle at the time of the accident. During the telephone call the Actor was informed that the policy on the vehicle was for liability only and that deer strikes were not covered. The Actor was informed that deer strikes are covered under comprehensive/collision coverage.



Docket Number: CC 1391-19	Date Filed: 0	TN/LiveScan Number 887 - 6	Complaint/Incident Number IF2018-0272
	First:	Middle:	Last:
Defendant Name:	ELIJAH	HAZEKI	YARBROUGH

- 3. On November 4, 2018, at approximately 11:03 PM the Actor telephoned Progressive and added the comprehensive/collision coverage to his vehicles policy.
- 4. On November 4, 2018, at approximately 11:20 PM the Actor telephoned Progressive and reported that he had just struck a deer after he added comprehensive/collision coverage to the vehicle policy.
- 5. On November 6, 2018, at approximately 8:59 AM Progressive Representative Brandon Hast conducted a recorded interview with the Actor. During the interview, Hast informed the Actor that each telephone call that he made to Progressive on November 4, 2018 in regard to his deer strike claim was recorded and time stamped. Hast explained to the Actor that the recordings indicated that he reported the deer strike and was informed that it was not covered because the vehicle was insured under a liability policy only. Hast told the Actor that in another recorded call that he added comprehensive coverage to cover the deer strike. Furthermore, Hast informed the Actor that in a subsequent recorded call he reported he stuck the deer after adding the comprehensive coverage to have the damages covered. The Actor denied the timeline and said that he struck the deer after he added the comprehensive coverage. Hast told the Actor that Progressive would continue to look into the claim and that he would be in touch with him.
- 6. On November 6, 2018, at approximately 9:01 AM the Actor called Progressive back and requested to withdraw the claim. The Actor said "my buddy is going to handle the damages for me".
- 7. Progressive denied the claim prior to having an estimator inspect the Actor's vehicle and did not determine the cost of the loss.
- D. Brenda Lacks was interviewed by your Affiant and Special Agent Jason Chimile and provided the following information:
 - Lacks is the Actor's mother. Lacks' name is listed as the owner and the insured on the 2002 Ford that the Actor was operating when he struck a deer. According to Lacks, the Actor is listed as the primary driver on the Progressive policy and makes the monthly premium payment. Lacks does not use/operate the Ford Explorer, only the Actor does.



Docket Number:		TN/LiveScan Number 887-し	Complaint/Incident Number IF2018-0272
	First:	Middle:	Last:
Defendant Name:	ELIJAH	HAZEKI	YARBROUGH

- 2. Lacks recalled that a couple days after the Actor struck the deer on 11/4/18 that she went on-line to check the Progressive policy to make sure it was paid. While doing so she discovered that a claim had been made. Lacks telephoned Progressive to enquire as to why a claim was made. That was when she was informed that the Actor hit a deer while operating the vehicle.
- 3. The Progressive representative informed Lacks that at the time the accident occurred the vehicle only had liability insurance and a deer strike would not have been covered. Also, she was informed that the Actor added the necessary coverage on the policy in order to have the damages covered after the accident occurred. She was told that the Actor then telephoned and reported that the accident occurred after adding the coverage.
- 4. Lacks thought that something was wrong and that it sounded like insurance fraud. Lacks did not say anything to the Actor about what she discovered. The Actor eventually told her about the accident several days later after she spoke with Progressive.
- E. Stephanie Laurick was interviewed by your Affiant and Supervisory Special Agent Robert Gift and provided the following information:
 - 1. Laurick is the Actor's girlfriend and they live together. Laurick was a passenger in the Actor's Ford Explorer on 11/4/18 when the vehicle was struck by a deer. Laurick said that the deer came out of nowhere and slammed into the vehicle while they were traveling near the BP gas station near the I79 off ramp.
 - Laurick said that they traveled to their residence and the Actor telephoned Progressive Insurance about the accident. Laurick said that was when the Actor discovered he did not have the correct coverage and made additional calls adding the new coverage to the vehicle policy.
- F. The Actor was interviewed by your Affiant and Special Agent Chimile and provided the following information:
 - 1. The Actor was involved in a vehicle accident on 11/4/18 when he struck a deer while operating his 2002 Ford Explorer. The Actor's girlfriend, Stephanie Laurick, who he lives with, was a passenger in his vehicle when the accident occurred.



An

Page __ of _

Docket Number:		TN/LiveScan Number	Complaint/Incident Number
CR-139-19	3/28/19/14/928	387-6	IF2018-0272
	First:	Middle:	Last:
Defendant Name:	ELIJAH	HAZEKI	YARBROUGH

- 2. After the Actor struck the deer he telephoned Progressive Insurance and reported that he hit a deer. The Progressive representative informed the Actor that he only had liability coverage on his vehicle and that deer hits are not covered. The representative explained that comprehensive/collision coverage pays for deer strikes.
- 3. After hanging up, the Actor called Progressive back and added comprehensive/collision onto his policy. After adding the coverage on, the Actor called Progressive again and reported that he had just struck the deer after adding comprehensive/collision coverage.
- 4. The Actor acknowledged that he provided a false statement to Progressive when he reported that the deer hit occurred after adding comprehensive/collision coverage. The Actor did it in an effort to have the damages to his vehicle covered by insurance.

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Elijah Hazeki Yarbrough.

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

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

	Kebel MCH	
	(Signature of Affiant)	
Sworn to me and subscribed before me this day of /	March 2019	_
Date	, Magisterial District Judge	
My commission expires first Monday of January, 2020	Control wash national and the state of the s	

AOPC 412A - Rev. 7/18

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: BUTLER **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 50-3-01 VS. MDJ: Hon. William S. O'Donnell (NAME and ADDRESS): Address: 520 Kelly Boulevard KATHERINE YOVA First Name Middle Name Slippery Rock, PA 16057 Last Name 2001 Moores Corner, Slippery Rock, PA 16057 Telephone: (724)794-6221 NCIC Extradition Code Type ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION OTN/LiveScan Number Docket Number Date Filed Complaint/Incident Number Request Lab Services? 1)679701-1 ☐ YES ⊠ NO IF20180250 **GENDER** ров 12/23/1981 POB Co-Defendant(s) Add'I DOB ☐ Male First Name Middle Name Last Name Gen. AKA ☑ White RACE Asian Black Native American Unknown **ETHNICITY** Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) Eye BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☒ NO **DNA Location** WEIGHT (lbs.) FBI Number MNU Number. 175 **Defendant Fingerprinted** ☐ YES Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. mat Plate # Ind. Sticker (MM/YY) same as Def. VIN Year Make Model Style Color П Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG KARA COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SUPERVISORY SPECIAL AGENT ROBERT M. GIFT BCI-139 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as

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

in BUTLER County

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [410]

(County Code)

[10]

240 S. Main St, Harrisville, Pa

on or about MAY 25, 2018 AND DATES THEREAFTER

NEW YEAR	POLICE	CRIMINAL	COMPLAIN
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Docket Nu	imbor	Date F	iladı	<u>.</u>	N/LiveSca	an Numh	Andrew 1.		plaint/incident i	. CONFLAINT
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PennD0 (if app	OT Data licable)	ccident Nur	mber				Interstate		Safety Zone	☐ Work Zone
	escription (inc	lude the r	name of stat	ute or ord	inance): T	HEFT BY	DECEPTIO	N		
question "Ha	s any driver or h ccassions and Eri	ousehold me e would not	ember ever bee	en arrested he Actor if s	for ANY reas	เอก", when	in fact, the Ifully, then f	Actor has a I iled a claim f	engthy criminal histor damage to her v	nswering "no" to the tory and had been arrested ehicle.
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On or about I automobile in the Actor, and	surance containi swered "no" to th	d dates ther ng any false ne question	eafter, the Actor information, o "Has any drive	or, knowingl or concealed r or househo	for the purpold member	oose of mis ever been	sleading info arrested for	rmation cond ANY reason	erning any fact ma	, filed an application for terial thereto, namely, Actor has a lengthy
Inchoate Offense	☐ Attempt		☐ Solicitation 18 902 A		Conspiracy 8 903		Numb	er of Victims	Age 60 or Older	
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	offense# S	Section Accident	Subsection		PA State	ıte (Title)	Counts	Grade	NCIC Offense C	_
(if app	licable)	Number		-4			Interstate		Safety Zone	☐ Work Zone
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On or about A Insurance Concerning ar the question	mpany any state ny fact or thing m 'Has any driver o	and dates ti ment formin naterial to th or household	hereafter, the A ng a part of or i ne insurance cla I member ever	Actor did kno n support o aim, namely been arrest	f any insura , the Actor f ed for ANY i	nce claim t raudulently reason", w	hat containe , obtained in hen in fact,	ed false, incom surance cove the Actor has	mplete, or misleadi erage on her vehicl	e by answering "no" to history and had been

AOPC 412A - Rev. 7/18

			POLICE CRIMINAL COMPLAIN
Docket Number: '	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CK 36-19	2/19/19	0679781-1	IF20180250

Docket Number:	Date Filed:	OTN/LiyeScan Number	Complaint/Incident Number
CK-36-19	2/19/19	U679701-1	IF20180250
	First:	Middle:	Last:
Defendant Name:	KATHERINE]	YOVA

- 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 3.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

AND NOW, on this date

2/19/19

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.

50-3-01

(Magisterial District Court Number)

Dunnell

SEAL

Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number

CR-36-19 0 16/19 0 16/20180250

Defendant Name: KATHERINE J WOVA

AFFIDAVIT of PROBABLE CAUSE

Date of Application:

Date of Violations:

May 25, 2018 and dates thereafter

Criminal Complaint No.:

Name of Affiants:

Supervisory Special Agent Robert M. Gift

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Your Affiant, Robert Gift, who is employed as a Supervisory Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since March 2000, is the case agent assigned to the investigation involving the Actor, Katherine Yova.
- B. The investigation of the Actor was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral from Lauren Lackey, Special Investigator with Erie Insurance. Lackey alleged that the Actor applied for automobile insurance coverage with the Turner Insurance Agency located in Harrisville, PA on May 25, 2018. While applying for the coverage the Actor answered "no" to the question "Has any driver or household member been arrested for ANY reason?" The Actor has been arrested approximately thirty (30) times and has fifteen (15) convictions. Lackey advised that if the Actor had answered "yes" to the question truthfully, Erie Insurance would not have issued a policy. On August 22, 2018 the Actor was involved in a single vehicle accident that caused approximately \$2,793.00 in damage that Erie Insurance paid. The amount of the theft is \$2,793.00; which is money Erie Insurance would not have paid if the policy had not been issued.
- C. Your Affiant reviewed the claim file provided by Lackey and found the following information:
 - 1. On May 25, 2018, the Actor incepted a new automobile policy with Erie Insurance at the Turner Insurance Agency located in Harrisville, PA. During the application process the Actor answered "no" to the question "Has any driver or household member been arrested for ANY reason?" The Actor has a lengthy criminal history and has been arrested on several occasions.
 - 2. Lackey advised that if the Actor had answered "yes" to the question Erie Insurance would not have issued a policy or insured the Actor.
 - 3. On August 22, 2018, the Actor made a claim with Erie Insurance stating that she was involved in a single vehicle accident. Erie Insurance paid the Actor \$2,793.00 for the damages to her vehicle from the accident.
- D. Your Affiant interviewed Doug Flickinger. Flickinger is an insurance agent with the Turner Insurance Agency and is the agent who issued a policy to the Actor. Flickinger provided the following information:
 - 1. According to Flickinger, he received an internet lead quote online that the Actor had completed. Flickinger received an email regarding the quote for the Actor, her husband, Michael Yova, and all vehicle information.
 - 2. Flickinger advised that after receiving the online quote he contacted the Actor by telephone. Flickinger stated that per his agency policy, he went over each and every question on the insurance application with the customer.

4834	POLICE CRIMINAL COMPLAINT
/LiveScan Number	Complaint/Incident Number

Docket Number:	Date Filed:	OTN/LiveScan Number しんフタフク/ - /	Complaint/Incident Number
Defendant Name:	First:	Middle:	Last:
Defendant Name:	KATHERINE	J	YOVA

- 3. Flickinger said that he specifically asked the Actor question B under the driver's question section that read "Has any driver or member of the household ever been arrested for ANY reason?". Flickinger stated the Actor answered "no" to the question.
- 4. According to Flickinger, had the Actor answered "yes" to the question he would have stopped the application process at that time because he knew that the customer would not be able to obtain insurance through Erie Insurance.
- 5. Flickinger advised that after the application was complete he emailed the finalized application to the Actor for her to e-sign and then she was to return to him for completion.
- 6. Your Affiant asked Flickinger how the Actor paid for the automobile policy. Flickinger said that the Actor specifically asked to have the payment done through an automatic draft each month. Flickinger stated that the Actor was supposed to bring in the initial down payment to the agency but never did.
- 7. Flickinger advised that the Actor never made one (1) payment to Erie Insurance for the automobile insurance policy.
- E. Your Affiant reviewed the Actor's criminal history and found the following:
 - 1. The Actor has been arrested approximately thirty (30) times in the last fifteen (15) years.
 - 2. The Actor has been convicted approximately fifteen (15) times in the last fifteen (15) years.
 - 3. The Actor's convictions include bad checks, theft and Insurance Fraud pre-dating the May 25, 2018 application.
- F. Your Affiant, along with Special Agent William McKee interviewed the Actor at her place of employment located in Slippery Rock, PA. The Actor provided the following information:
 - 1. According to the Actor, in August of 2018 she was involved in a single vehicle accident in which a deer ran out in front of her vehicle causing her to swerve and hit a bridge barrier. The Actor advised that there was minor damage to her vehicle but she still decided to submit a claim with her insurance company, Erie Insurance.
 - 2. The Actor advised that she had recently changed her automobile insurance coverage in May of 2018 from Allstate Insurance to Erie Insurance. The Actor stated that she did this because she was paying approximately \$350.00 a month for the Allstate Insurance coverage and was paying only \$180.00 a month for the Erie Insurance coverage.
 - 3. Your Affiant inquired into how she completed the insurance coverage change. The Actor said she first obtained the insurance coverage quote online. After receiving the quote the Actor submitted the insurance application online and admitted to e-signing the document.
 - 4. Your Affiant allowed the Actor to review the document in question. The Actor agreed that the document was in fact the document she had completed for the Erie Insurance coverage.
 - 5. The Actor advised that she was then required to go to the insurance agency, Turner Insurance Agency, and complete the same application/document in person.
 - 6. The Actor was then asked about question B under the driver's question section that read "Has any driver or member of the household ever been arrested for ANY reason?". The Actor answered "no" to the question.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number					
	First:	Middle;	Last:					
Defendant Name:	KATHERINE	J	YOVA	(

- 7. The Actor admitted to having a pretty substantial criminal history but stated that she answered "no" to the question both online and in person at the insurance agency because "she was embarrassed" and "people look at you differently" if you answer yes to having a criminal history.
- 8. The Actor admitted to your Affiant to providing false / fraudulent information on the application.

Based upon the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the issuance of an arrest warrant for the Actor, Katherine Yova.

I, SUPERVISORY SPECIAL AGENT ROBERT M. GIFT, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

	(Signature of Affiant)
Sworn to me and subscribed before me this day of	FEBruary 2019
Date S S Ox mell	, Magisterial District Judge
My commission expires first Monday of January, 2022	
	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: SOMERSET COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 16-3-01 VS. MDJ: Hon. SUSAN MANKAMYER (NAME and ADDRESS): VARNER Address: 805 ATKINSON WAY KELLY Middle Name Last Name Gen First Name BOSWELL, PA 15531 5805 SOMERSET PIKE BOSWELL, PA 15531 Telephone: (814)629-9775 NCIC Extradition Code Type C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition □ 1-Felony Full Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States □ A-Misdemeanor Full 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number 3 12812019 U1092817-☐ YES ⊠ NO CK-41-2019 TF-2018-0235 **GENDER** ров 09/22/1975 ров Ра Co-Defendant(s) \boxtimes Add'l DOB Gen. ☐ Male Middle Name Last Name First Name AKA RACE ☑ White ☐ Black □ Native American ☐ Unknown Asian ETHNICITY Hispanic Unknown Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) BLK (Black) ONG (Orange) Color BLN (Bionde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye ☐ HAZ (Hazel) Color MAR (Marcon) PNK (Pink) MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) DNA ☐ YES ☒ NO **DNA Location FBI Number** MNU Number 110 **Defendant Fingerprinted** ☐ YES ☒ NO Ft. HEIGHT In. 3 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** Registration Comm'i Veh. School Veh. Oth. NCIC Veh. Code Reg. State Haz Plate # KMP0065 mat Ind. same as PA Sticker (MM/YY) Def. VIN Year Make Model Style Color \boxtimes Black 2013 Subaru Crosstrek JF2GPAWC3D2863579 Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG JEROEM ORIE (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SA JAMES KOPERA (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as

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

(Subdivision Code)

on or about JULY 19, 2018 AND DATES THEREAFTER

in SOMERSET County

15522

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [404]

(County Code)

[56]

5805 Somerset Pike, Boswell, Pa

(Place-Political Subdivision)



,								%	British B	OL				MPLAINT_
Docket Number	er:	Date	Filed:		ОТ	N/LiveSca	ın Num	Number Complaint/Incident Number IF-2018-0235				er		
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Defendant Nar	ne:	KELLY				whate.		VARNER					}	
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Acts of the ac of Theft by Dece from Progressive	Statute Description (include the name of statute or ordinance): CRIMINAL ATTEMPT/THEFT BY DECEPTION Acts of the accused associated with this Offense: On or about July 19, 2018 and dates thereafter, the Actor did, with the intent to commit the crime of Theft by Deception, any act that constituted a substantial step toward the commission of that crime, namely, in an attempt to obtain in excess of \$2,000.00 from Progressive Insurance Company, the Actor stated that an accident occurred at a time after obtaining insurance, when in fact, the accident occurred prior to obtaining the insurance coverage.									xcess of \$2,000.00				
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0235	
Defendant Name:	First: KELLY	Middle:	Last: VARNER	

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.

5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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.)

AND NOW, on this date

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

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

(Magisterial District Court Number)

(Issuing Authority)

SEAL

Complaint/Incident Number Date Filed: OTN/LiveScan Number Docket Number: IF-2018-0235 Middle: Last: First: Defendant Name: **VARNER KELLY**

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

July 19, 2018 and dates thereafter

Criminal Complaint No:

IF-2018-0235

Name of Affiant:

Special Agent James Kopera

Law Enforcement Agency: Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 564 Forbes Avenue Pittsburgh, PA

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since April 2007, is the case agent assigned to the investigation involving the Actor, Kelly Varner.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Chelsea Reidlinger of Progressive Insurance Company. The investigation revealed that the Actor, Kelly Varner, purchased an insurance policy with Progressive Insurance Company on July 19, 2018 at approximately 3:48 PM. Later on that same date, the Actor filed a claim with Progressive Insurance Company. During the reporting of the claim, the Actor told Progressive Insurance that her husband Sean had struck a deer on his way home from work at approximately 5:00 PM on July 19, 2018. The Progressive Insurance Company investigation revealed that the accident occurred at approximately 5:00 AM on July 19, 2018 when the Actor's husband Sean struck a deer on his way to work.
- C. Your Affiant reviewed the Progressive Insurance Company file and spoke with Chelsea Reidlinger, Special Investigator with Progressive Insurance Company. The following was found:
 - 1. The Actor purchased a full coverage automobile policy with Progressive Insurance Company at the Watt Insurance Agency on July 19, 2018 at approximately 3:48 PM.
 - 2. On July 19, 2018 at approximately 5:30 PM, the Actor filed a claim with Progressive Insurance stating that her husband Sean had been in accident at approximately 5:00 PM that same day while driving their 2013 Subaru Crosstrek.
 - 3. Sean Varner was interviewed by Progressive Insurance and stated that the accident occurred on July 19, 2018 at 5:00 AM.
 - 4. Progressive Insurance verified with Sean Varner's employer, Monaloh Basin Engineers, that the accident occurred on his way to work at approximately 5:00 AM.
 - 5. Progressive Insurance verified with Sean Varner's employer, Monaloh Basin Engineers, that Varner worked until 6PM on the day of the accident, therefore, the accident could not have occurred at approximately 5:00 PM.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0235
	First:	Middle:	Last:
Defendant Name:	KELLY		VARNER

- 6. Progressive Insurance estimated the damages to be \$2,822.17.
- D. Tammy Watt of Watt Insurance Agency provided the following information to your Affiant:
 - 1. Watt verified that the Actor came to her office on July 19, 2018 at approximately 3:30 PM and purchased an automobile insurance policy through Progressive Insurance Company.
 - 2. The policy was a full coverage policy for vehicles owned by her and her husband that included a 2013 Subaru Crosstrek.
- E. Bill Parisi, supervisor of Sean Varner, provided the following information to your Affiant:
 - 1. Parisi verified that Sean Varner was an employee of Monaloh Basin Engineers and he was his supervisor. On or about July 19, 2018, Parisi noticed that Varner was driving a pick-up truck to work. He asked Varner what had happened and he stated that he struck a deer with his Subaru Crosstrek on his way to work and had to return home and get another vehicle.
 - 2. Parisi stated that the discussion he had with Varner was either prior to work or in the morning on the day Varner struck the deer.
- F. The Actor provided the following information:
 - 1. The Actor stated that on July 19, 2018, her husband Sean notified her that he struck a deer on his way to work while driving their 2013 Subaru Crosstrek. The accident occurred at approximately 5:00 AM. The Actor realized that her Nationwide Insurance policy had just expired. The Actor stated that she panicked realizing that her insurance would not cover the damages so she went to The Watt Insurance Agency on the same day at approximately 3:30 PM and obtained a new policy with Progressive Insurance.
 - 2. When obtaining the new policy, the Actor did not disclose that her husband had just been in an accident. The Actor returned home after obtaining the new policy. At approximately 5:30 PM, the Actor called Progressive Insurance and filed a claim indicating that her husband had struck a deer on his way home from work at around 5 PM. The Actor provided Progressive Insurance with photographs she had taken at approximately 5:45 PM on July 19th as proof of when the accident occurred.
 - 3. The Actor admitted that the accident did occur on July 19th early in the morning when her husband was on his way to work. The Actor provided Progressive Insurance with the wrong time of the accident in hopes that they would cover the damages to the vehicle.

D	. c
Page	of

	POLICE	CRIMINAL	COMPLAIN
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Docket Number:	Date Filed:	OTN/LiveScan N	lumber Complaint/Incident Number IF-2018-0235
Defendant Name:	First:	Middle:	Last:
	KELLY		VARNER

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Kelly Varner.

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

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

	(Signature of Affiant)
Sworn to me and subscribed before me this day of	March 2019
Date May Mamay	, Magisterial District Judge
My commission expires first Monday of January, 2024	
	SEAL
	· ·

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: Hon, EUGENE F RIAZZI Magisterial District Number: 05-2-13 Address: 687 O'NEIL BLVD



POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT:

(NAME and ADDRESS):

PAGE

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Docket Number: Date	Filed: OTN/LiveScan Nu	umber	Complaint/Incident Number
CK-143-19 330) G 833218-1		IF-2018-0267
Defendant Name First: KIM		Middle:	Last: PAGE

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.)

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AOPC 412A - Rev. 09/08

Page 2 of 3



Docket Number:	Date Filed:	OTN/LiveScan Number G 833218-1	Complaint/Incident Number IF-2018-0267
Defendant Name	First. KIM	Middle:	Last: PAGE

- 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 is comprised of the preceding page(s) numbered through
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently 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.)

			26
	(Date)		(Signature of Affiant)
AND NOW, on this date	3-20-1	I certify that the complain	, nt has been properly completed and verified.
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(Magisterial District Court Nu	mber)	(Issuing Authority)	 SEAL
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EUGENE F. RIAZZI, JR., MAGISTERIAL DISTRICT JUDGE MAGISTERIAL DISTRICT 05-2-13 MY COMMISSION EXPIRES ON THE FIRST MONDAY IN JANUARY, 2020

AOPC 412A - Rev. 09/08

Page 3 of 3





Docket Number:	Date Filed:	OTN/LiveScan Number G 833218-1		Complaint/Incident Number IF-2018-0267
Defendant Name	First: KIM	The state of the s	Middle:	Last: PAGE

AFFIDAVIT of PROBABLE CAUSE

WHEN:

Date when Affiant received information:

12_/20_/_2018___

Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

11__/20__/_2018___

HOW:

How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.): based on information received

How the source of information knows this particular person committed the crime: b)

based on information received from reliable source

How both Affiant and/or source of information knows that a particular crime has been committed: based on information received from reliable source

3. WHAT CRIMES:

18 4117 A2 INSURANCE FRAUD 18 3922 A1 THEFT BY DECEPTION

WHERE CRIME(S) COMMITTED:

ALLEGHENY COUNTY

WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

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

Affiant and/or other Police Officers corroborated details of the information



100 110 10 10 10	TN/LiveScan Number 833218-1	Complaint/incident Number IF-2018-0267
Defendant Name First: KIM	Middle:	Last: PAGE

Date of Violation:

October 9, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Jason Chimile

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

1251 Waterfront Place Mezzanine Level

Pittsburgh, PA 15222

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since October 2015, is the case agent assigned to the investigation involving the Actor, Kim Page.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Brandt Salnick of Progressive Insurance. The investigation revealed that the Actor purchased a Progressive Insurance policy on July 12, 2018. The Actor called Progressive Insurance on October 9, 2018 and reported a claim. The Actor stated that on October 9, 2018 while her vehicle was parked it was involved in a hit and run causing damage to the passenger's side rear of her vehicle. The Actor stated there were no witnesses and the police were not notified of the incident. On October 15, 2018 Progressive Insurance inspected the Actor's vehicle. The damage to the Actor's vehicle did not appear to be new damage. There was dirt in the broken rear taillight and there was old tape residue on the vehicle. Progressive Insurance ran the Actor's license plate through their license plate reader database. The database indicated that the Actor's vehicle was captured in the Monroeville, Pa. area on April 11, 2018 with the same damage that she was claiming occurred from the hit and run accident on October 9, 2018. Progressive Insurance confronted the Actor with the photo that they obtained from running her license plate through their license plate reader database. The Actor apologized for the situation and stated that she just wanted to get her vehicle repaired. The attempted amount of theft is \$1,804.34.
- C. Your Affiant reviewed the claim filed with Progressive Insurance and found the following:
- 1. The investigation revealed that the Actor purchased a Progressive Insurance policy on July 12, 2018. The Actor reported a claim to Progressive Insurance on October 9, 2018 at 12:56 P.M. The Actor stated that her 2014 Kia Optima was involved in a hit and run accident while the vehicle was parked outside of her mother's residence located at North Euclid Avenue, Pittsburgh, Pa.
- 2. The Actor stated that she woke up in the morning on October 9, 2018 to take her kids to daycare when she noticed the damage to the driver's side rear bumper and taillight area of her vehicle. The Actor stated that there were no witnesses to the accident and she did not call the police.
- 3. The Actor stated that she had a friend of hers tape the bumper and taillight so that they would stay on.
- 4. Progressive Insurance inspected the Actor's vehicle on October 15, 2018. Progressive Insurance determined that the damage did not appear to be fresh. There was dirt in the broken lamp, and old tape residue on the vehicle where the Actor claimed the damages occurred.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
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Defendant Name	First:	Middle:	Last:
- Deletioant Ivanie	KIM		PAGE

- 5. Progressive Insurance ran the Actor's license plate in their license plate reader database. The Actor's 2014 Kia Optima was captured on Progressive Insurances vehicle sightings report on April 11, 2018 with the same damages that the Actor was claiming on the hit and run accident that occurred on October 9, 2018,
- D. Special Agent Bradly Capan interviewed Michael Pletz, owner of A.L. Recovery. Pletz provided the following information:
- 1. A.L. Recovery is a towing business that specializes in financial institution repossessions of vehicles that are delinquent on their loan payments. Pletz stated that he does operate five vehicles with license plate readers and they are in operation about 20 hours a day. The information collected from the license plate readers is uploaded to DRN which is located in Fort Worth, TX and stored at this location.
- 2. Pletz was able to contact his account representative at DRN who confirmed that the photograph of Page's vehicle (KMY1544 / PA) taken on April 11, 2018 at 1848 hours in or near Monroeville, PA was taken by A.L. Recovery. The photograph depicts damage to the passenger side rear quarter panel and bumper and Pletz was able to confirm the authenticity of the photograph as taken by A.L. Recovery.
- 3. The Vehicle Sightings Report from Progressive Insurance reveals that the Actor's 2014 Kia Optima, license plate KMY-1544 was parked in Monroeville, Pa. on April 11, 2018. The photo shows the rear passenger side of the Actor's vehicle with tape along the bumper and on the rear taillight.
- 4. The total amount in damages to the Actor's vehicle totaled \$1,804.34.
- E. On Tuesday, December 11, 2018, your Affiant, along with Special Agent William McKee, interviewed Dave Trunzo at his residence located at 2123 Duquesne Avenue, McKeesport, Pa. Trunzo provided the following information:
- 1. Trunzo was asked if he knew his neighbors, the Actor and Frank Richardson. Trunzo stated that he did not personally know them but he has seen them before.
- 2. Trunzo was asked if he has seen their black Kia Optima parked out front, and he stated "yes".
- 3. Trunzo was asked if he has noticed the tape on the rear bumper and taillight area of the vehicle.
- 4. Trunzo advised that he has seen the tape on the vehicle. Trunzo stated that the tape on the rear bumper and taillight area has been on the vehicle since they moved into the residence, located at 2125 ½ Duquesne Avenue, McKeesport, PA.
- F. On Tuesday, December 11, 2018, your Affiant, along with Special Agent William McKee interviewed Frank Richardson at his residence located at 2125 1/2 Duquesne Avenue, McKeesport, Pa. Richardson provided the following information:
- 1. Richardson was asked if he taped the rear bumper and taillight of his girlfriend, the Actor's, black Kia Optima.
- 2. Richardson advised that he did the repairs to the vehicle. Richardson stated that he could not remember when he put the tape on the rear of the vehicle.
- 3. Richardson was asked what happened to the vehicle to cause the damage to the rear end. Richardson stated that he did not know what happened to the vehicle.

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				TOLICE OF GENERAL CONTRACTOR CONT
Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/incident Number
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Defendant Name	First:		Middle:	Last:
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- 4. Richardson was asked if he had any pictures of the vehicle from after the accident and he stated "no".
- 5. Richardson was asked when he and the Actor moved into the residence located at 2125 ½ Duquesne Avenue, McKeesport,
- Pa. Richardson advised that he and the Actor moved into the residence in June, 2017.
- G. On Tuesday, December 11, 2018 your Affiant, along with Special Agent William McKee interviewed the Actor at her residence located at 2125 1/2 Duquesne Avenue, McKeesport, Pa. The Actor provided the following information:
- 1. The Actor was asked if she could explain the damages to the rear passenger's side bumper, and the claim that she filed with Progressive Insurance.
- 2. The Actor advised that she lied to Progressive Insurance about when the damages to her vehicle occurred when she filed a claim with them.
- 3. The Actor stated that the accident occurred when she was driving on the parkway and she was insured with Nationwide Insurance.
- 4. The Actor advised that she had liability coverage only on her Nationwide Insurance policy so she never filed a claim with them.
- 5. The Actor advised that someone hit her vehicle from the rear on the parkway and when they pulled over to exchange information the other person gave her false information.
- 6. The Actor stated that they never called the police for the accident and she could not get in touch with the driver of the other vehicle.
- 7. The Actor advised that the statement that she told Progressive Insurance about her vehicle being parked at her mother's residence in East Liberty, Pa. when the damage occurred was made up.
- 8. The Actor advised that she purchased a Progressive Insurance policy on July 12, 2018 and filed a claim for the damages to her vehicle so that she could get her vehicle fixed.



	Date Filed: OTN/LiveScan Number			Complaint/Incident Number			
Defendant Name First: KIM	Middle:	***************************************	Last: PAGE				
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I, JASON CHIMILE THAT THE FACTS SET FORTH IN THE FOR KNOWLEDGE, INFORMATION AND BELIE	REGOING AFF	IDAVIT AR	E TRUE AND CO	OTHE LAW, DEPOSE AND SAY DRRECT TO THE BEST OF MY			
I CERTIFY THAT THIS FILING COMPLIES NO POLICY OF THE UNIFIED JUDICIAL SYSTI INFORMATION AND DOCUMENTS DIFFER	EM OF PENNS	YLVANIA '	THAT REQUIRE	FILING CONFIDENTIAL			
				(Signature of Affiant)			
Sworn to me and subscribed before me this	20	day of	· nuch	. 2018			
Date	<u> </u>	MARKET CONTRACTOR OF THE CONTR	, Mag	gisterial District Judge			
My commission expires first Monday of Janua	ary,						
•	EUGENE F. RI MAGISTERIAI MAGISTERIAI MY COMMISSI FIRST MONDA	DISTRIC	T JUDGE T 05-2-13	SEAL			

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: BEDFORD COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 57-3-02 MDJ: Hon. H. Cyril Bingham Jr. (NAME and ADDRESS): Address: 120 West John Street LEVI LOGSDON First Name Bedford, Pa 15522 Middle Name Last Name Gen 134 Earl Emerick Rd. Telephone: (814)623-6918 Hyndman, Pa 15545 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number CR-39-2019 Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services? 03/01/19 U 683940-5 ☐ YES 🖾 NO IF-2018-0199 GENDER ров 01/27/1993 ров Ра Add'l DOB Co-Defendant(s) \boxtimes Male First Name Middle Name Last Name Gen. Female AKA RACE ☑ White Asian Black ☐ Native American Unknown ETHNICITY Hispanic ■ Noп-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color GRN (Green) PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) Eye BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Color X HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA **DNA Location** ☐ YES ☒ NO WEIGHT (lbs.) FBI Number MNU Number 200 Defendant Fingerprinted ☐ YES NO NO Ft. HEIGHT In. Fingerprint Classification: 10 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. Plate # mat Ind. Sticker (MM/YY) 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). SDAG DENNIS KISTLER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) SA JAMES KOPERA 15 and (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above \square 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 [401] 109 Reservoir Rd. Bedford, Pa (Place-Political Subdivision) 15522 (Subdivision Code) in BEDFORD County [07] on or about JUNE 27, 2018 AND DATES THEREAFTER

(County Code)

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Docket Number:	Date Filed:	OTN/LiveSc	an Number	1 22 00 200 200	plaint/Incident N	umber
CR-39-2019	03/01/19	U 683940-5			018-0199	
Defendant Name:	First: LEVI	Middle: W		Last: LOGSDON	J	
The acts committed by When there is more that (Set forth a brief summary or without more, is not sufficient the age of the victim at the tipe listed. If the identity of an	an one offense, ead f the facts sufficient to nt. In a summary case, t ime of the offense may	ch offense should be r advise the defendant of the you must cite the specific s be included if known. In ac	numbered chrono nature of the offense ection(s) and subsec idition, social security	ibly or statut logically. (s) charged. A tion(s) of the st	te allegedly violation to the statutatute(s) or ordinancial information	te(s) allegedly violated,
Inchoate ☐ Attempt Offense 18 901 A	Solicitat 18 902 A			Number of	Victims Age 60 or	Older
☐ 1 4117 Offense	A 2	of the 18		F-3		
Lead? # Se	ection Subsection	on PA State	ite (Title) Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
(if applicable)	Accident Number		☐ Interstate	i	Safety Zone	☐ Work Zone
Statute Description (inc	nude the name of s	statute or ordinance): 1	INSURANCE FRAUE	•		•
Acts of the accused as intent to defraud an insurer of forming a part of or in suppoinsurance claim, namely, the vehicle insurance was obtained.	or seir-insured, namely, rt of any insurance dail Actor presented inform	Agency Insurance Compan n, that contained false, inc ation to Agency Insurance	y, present or cause to Omplete, or misleadin Company that an acc) be presented g information o ident occurred.	to Agency Insurance concerning any fact of at a time after com-	e Company any statement
Inchoate ⊠ Attemp Offense 18 901 /			Num	ber of Victims	Age 60 or Older	
□ 2 3922	(A)(1) of the 18 PA	C.S. 1	M-1		
PennDOT⊦Data	Section Subsection Subsection	tion PA Stat	ute (Title) Counts		NCIC Offense Co ☐ Safety Zone	
(If applicable) Statute Description (inc	Number ude the name of s	tatute or ordinance): c		- -		☐ Work Zone
(***		isitato or oranianos), e	MININAL ATTEMP	/ IIILE I B) D	PECENITOR	
Acts of the accused ass crime of Theft by Deception, a \$200.00 and \$2,000.00 from a obtained, when in fact, the ac	any act that constituted Agency Insurance Comi	a substantial step toward canv, the Actor stated that	the commission of the	at crime, name at a time after	ly in an attempt to	obtain botwoon
Inchoate			Numi	er of Victims	Age 60 or Older _	_
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PennDOT Data	Section Subsec	lion PA Statu	ite (Title) Counts	Grade	NCIC Offense Coo	
(if applicable) Statute Description (incl	Number ——— ude the name of st	– atute or ordinance): 11			_ Calcty Zulle	☐ Work Zone
. ,						
Acts of the accused assigned defraud Agency Insurance Corporate of the presented to any insurer or concerning any fact or thing maccident at a time after adding collision insurance to the insur	ripany, assist, abet, soil self insured in connect naterial to the claim, na a comprehensive and co	ion with, or in support of, a mely, the Actor and Mock a	r, namely, Makayla M claim that contains a greed to tell Agency	ock, to prepare any false, incon Insurance Com	or make any stater nplete or misleading nany that Makayla N	nent that is intended to information

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Docket Number:	Date Filed:	0	TN/LiveScan Number	Complaint/Incident Number
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Defendant Name:	First:		Middle:	Last:
Derengant Name:	LEVI		W	LOGSDON

- 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 3.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.) (Date) AND NOW, on this date I certify that the complaint has been properly completed and verified. March 1, 2019 An affidavit of probable cause must be completed before a warrant can be issued 57-3-02 (Magisterial District Court Number) SEAL

Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number CR-39-2019 03/01//19 U 683940-5 IF-2018-0199 First: Middle: Last: Defendant Name: **LEVI** W LOGSDON

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

June 27, 2018 and dates thereafter

Criminal Complaint No:

IF-2018-0199

Name of Affiant:

Special Agent James Kopera

Law Enforcement Agency: Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 564 Forbes Avenue Pittsburgh, PA

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since April 2007, is the case agent assigned to the investigation involving the Actor, Levi W. Logsdon.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Byron Edgecomb of Agency Insurance Company. The investigation revealed that Makayla Mock struck a deer at 11:37 PM on June 26, 2018. Mock contacted Agency Insurance and added comprehensive and collision coverage to her policy at 11:12 AM on June 27, 2018. The Actor and/or Makayla Mock then filed a claim with Agency Insurance on July 11, 2018 and claimed that Mock struck a deer on July 10, 2018, at a time after Mock obtained comprehensive and collision coverage, when in fact, the accident occurred prior to obtaining the comprehensive and collision coverage.
- C. Your Affiant reviewed the Agency Insurance Company file and spoke with Byron Edgecomb, Special Investigator with Agency Insurance Company, and found the following:
 - 1. Makayla Mock purchased a liability only insurance policy for a 2006 Ford Focus on May 17, 2018 with Agency Insurance Company.
 - 2. Makayla Mock added comprehensive and collision coverage to the policy on June 27, 2018, at approximately 11:12 AM.
 - 3. The Actor contacted Agency Insurance Company on July 11, 2018 and filed a claim on behalf of Makayla Mock. The Actor stated that the accident occurred the previous night on July 10, 2018.
 - 4. Makayla Mock provided a recorded statement to Agency Insurance Company on July 16, 2018 and stated that the accident occurred on July 10, 2018. Mock sent photographs the night of the accident and the metadata showed the pictures were taken on June 26, 2018 at 11:54 PM, confirming the photographs were taken prior to Mock adding comprehensive and collision insurance to her policy.



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Docket Number:	Date Filed:	0	TN/LiveScan Number	Complaint/Incident Number
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Defendant Name:	First:		Middle:	Last:
Delendant Name:	LEVI		l w	LOGSDON

- 5. Byron Edgecomb provided your Affiant with the original photographs sent by Mock. The photograph metadata was analyzed by Supervisory Special Agent John O'Brien of the Pennsylvania Office of Attorney General. The report submitted by O'Brien verified the photographs were taken on June 26, 2018 at 11:54 PM.
- 6. In a recorded call from Agency Insurance Company the Actor stated that the accident occurred at a time after Mock obtained comprehensive and collision coverage. Specifically, Byron Edgecomb of Agency Insurance Company told the Actor that Mock obtained her insurance coverage on June 27, 2018, and then asked the Actor if the accident occurred before or after that date. The Actor stated that he was 100 percent sure the accident occurred after that date. The Actor further verified that he did call in the claim on July 11, 2018.
- D. Bedford PA State Police provided the following information to your Affiant:
 - 1. Accident report PA 2018-716104 written by PA State Trooper Rusty Hays was provided to your Affiant. The report verifies the accident involving Makayla Mock occurred on June 26, 2018 at 11:37 PM.
 - 2. The vehicle, a 2006 Ford Focus, was being operated by Mock at the time of the accident.
- E. The Actor provided the following information to your Affiant:
 - 1. The Actor stated sometime in the summer of 2018 his mother, Kim Clites, received a phone call from Makayla Mock close to midnight. Mock told his mother that she had struck a deer and asked if she could come and help her. His mother then contacted him and both he and his mother drove to Buffalo Mills and met Mock. The Actor stated that when they got to the accident scene an ambulance was treating Mock and the police were there. He could not recall what police department. The Actor stated that after Mock was treated, she and his mother drove her car, a 2006 Ford Focus, to her house and the Actor followed behind them. The Actor stated that he could not recall the date of the accident but recalled that sometime after the accident Mock dropped her car off at his house where it was examined by her insurance company.
 - 2. The Actor stated that sometime after the accident Mock had asked his mother if she would call in the claim to Mock's insurance because she did not know what to do. At some point his mother then asked him to call in the claim. The Actor stated that he did call Mock's insurance company and told them that the accident occurred the night before. He stated he could not recall any of the dates but he did acknowledge that the accident could not have occurred the night before he called the insurance. He agreed that the accident must have occurred earlier than he told the insurance company after admitting it did not happen the night before he called in the claim.
- F. Makayla Mock provided the following information to your Affiant:
 - Mock stated that on or about June 26, 2018, she left work at Wal-Mart and was traveling home on route 96 when a deer ran across the road and struck her 2006 Ford Focus. She



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Defendant Name:	M LEVI		l w	LOGSDON

stated that after the deer hit, she pulled off the road and called Kim Clites, the mother of her ex-boyfriend, the Actor. She stated that an ambulance and the PA State Police arrived. When talking to Clites, she asked if she could come to the accident scene and help her get home.

- 2. Clites arrived on the scene, along with the Actor. Mock stated that she and Clites then drove her car to her house and the Actor followed behind them. The following day, Mock realized that she only had liability coverage on her car so she called her insurance company and added comprehensive coverage so that her insurance would cover the cost of repairs. She stated that she knew it was wrong but that she panicked and knew she did not have the money to get the car fixed.
- 3. A day or two after the accident Mock drove the car to the Actor's house, hoping that he would be able to fix it. She stated that about two weeks after the accident she contacted Clites and the Actor and asked them to call her insurance company and give them a wrong date and time of the accident.
- 4. Mock stated that she instructed the Actor to tell them the accident occurred on July 10, 2018, and that she would also tell the insurance that same date. She stated that she did speak to her insurance company and admitted that she told them the wrong date of the accident in hopes that they would pay for the damages.
- 5. Mock verified that she took photographs of the damage to the car right after the accident and sent them to her insurance company. She also verified that there were no other accidents to her car between the day of the deer strike and the date the claim was filed.
- 6. Mock stated that while the car was at the Actor's house, an appraiser from her insurance company appraised the damage. A copy of the appraisal shows that the damage totaled \$1,296.57 and she had a \$500.00 deductible.
- G. The Actor was again interviewed by your Affiant after your Affiant obtained additional information from Mock, and he provided the following information:
 - 1. The Actor was asked if Mock contacted him and asked him to file a claim for her and lie about the day and time of the accident. The Actor admitted that she did call him and told him what day and time to tell the insurance company so that her insurance would cover the damages to her car.
 - 2. The Actor stated that Mock promised him that when she got the insurance money he would be able to pay off the loan on her car. The Actor admitted that he got a personal loan for approximately \$2,500.00 dollars and gave the money to Mock so that she could purchase the Ford Focus. The Actor stated that after getting the call from Mock telling him to call her insurance company, he did make the call and lied to them in order for her to get money in hopes that she would help him pay off his loan.
 - 3. The Actor verified that the day and time of the accident he told Mock's insurance company was not the correct day and time of the accident.

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-39-2019	03/0/1//19	U 683940-5	IF-2018-0199
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: Derengant Name:	LEVI	l W	LOGSDON

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Levi W. Logsdon.

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

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

	C/Kap In
	(Signature of Affiant)
Sworn to me and subscribed before me this First day of March	2019
03/01/19 Date	_ , Magisterial District Judge
My commission expires first Monday of Vanuary, 2022	
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COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: CRAWFORD **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 30-2-01 VS. MDJ: Hon. Samuel V. Pendolino DEFENDANT: (NAME and ADDRESS): Address: 894 Diamond Park **LEWIS EDWARD** BENTLEY JR First Name Meadville, PA 16335 Middle Name Last Name Gen 306 Randolph Street, Meadville, PA 16335 Telephone: (814)724-2736 NCIC Extradition Code Type 1-Felony Fuli ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services? CR-053-19 02 / 20/ 2019 U 680207-3 ☐ YES ☐ NO IF20180121 **GENDER** ров 03/05/1976 POB Add'l DOB Co-Defendant(s) Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☑ White ☐ Asian Biack ☐ Native American Unknown ETHNICITY ☐ Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) GRN (Green) Color PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) Eye BRO (Brown) GRN (Green) GRY (Grav) Color ☐ HAZ (Hazel) MAR (Marcon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) **FBI Number MNU Number Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 5 11 **DEFENDANT VEHICLE INFORMATION** State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. Plate # mat Ind. Sticker (MM/YY) 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). SDAG KARA COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) AMY L ADAMS BCI-478 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] 306 Randolph Street, Meadville, Pa 16335 (Place-Political Subdivision) in CRAWFORD County [20] on or about MARCH 16, 2018 AND DATES THEREAFTER (County Code)

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Defendant N	ame:	LEWIS			EDWAR)			EY JR		
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The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)											
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	LEWIS	EDWARD	BENTLEY JR
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- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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.)

2-20-19

(Date)

912

(Signature of Affiant)

AND NOW, on this date

2-20-19

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.

30-2-01

(Magisterial District Court Number)

(Issuing Authority)

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AFFIDAVIT of PROBABLE CAUSE

Date of Application:

2-20-19

Date of Violations:

March 16, 2018 and dates thereafter

Criminal Complaint No.:

Name of Affiants:

Special Agent Amy L. Adams

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Affiant Adams, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and has been employed with the office since June 2009, is the case agent assigned to the investigation involving the Actor, Lewis E. Bentley, Jr.
- B. The investigation of the Actor was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral from Lauren Lackey, Special Investigator with Erie Insurance. Lackey alleged that the Actor included pre-existing damages to his hit and run claim on his 2010 Chevrolet Equinox. Lackey's investigation revealed that the front end damages were caused during an accident that occurred on February 19, 2018. At the time of the accident, Brandon Irwin, an excluded driver, was operating the vehicle. The total amount of attempted theft was \$1,231.78.
- C. Your Affiant reviewed the claim filed with Erie Insurance and spoke with Lauren Lackey and found the following:
 - On November 6, 2017, the Actor went to Schwab Insurance Agency to add Brandon Irwin to his automobile insurance policy. The Actor told the agent that Irwin was residing with him at 306 Randolph Street in Meadville, PA. The Actor was told that his premiums would increase \$700.00 because of Irwin's criminal record. The Actor decided not to add Irwin to his policy. The Actor was then told that if he wanted his policy to remain the same, he would need to exclude Irwin as a driver on his policy.
 - 2. On December 8, 2017, the Actor signed an Erie Insurance Named Person Exclusion Endorsement form stating that Brandon Irwin was an excluded person on his policy. The form stated that "Erie shall not be liable to anyone for any loss, damage, cause of action, or claim, including but not limited to, a liability claim, property damage claim, comprehensive or collision claim, first party benefit claim, uninsured motorist claim, underinsured motorist claim, vicarious liability claim, or any other claim, arising from the operation of any motor vehicle being operated by Brandon Irwin."
 - 3. On March 16, 2018 at 11:49 am, the Actor filed a claim for damages to his vehicle that he said occurred during a hit and run accident that he alleged occurred in front of his house earlier that day. The Actor told Erie Insurance that an unknown male was driving a red colored vehicle when they hit his Chevrolet Equinox that was parked in front of his house. There was damage to the front grill and bumper cover and back bumper cover.



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Docket Number:	Date Filed:	, , 0	TN/LiveScar	Number		Complaint/Incident Number	7. 1 ₄ -1 2. 7
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Defendant Name:	First:		Middle:		Last:		
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- 4. On March 16, 2018, Irwin got two separate estimates for the damages at Dillaman Auto Body. The front estimate was \$1,731.78 minus the Actor's \$500.00 deductible and the rear estimate was \$1,659.05 minus the Actor's \$500.00 deductible.
- 5. On March 19, 2018, Erie claims Representative Angela Petrungaro interviewed the Actor via the telephone. The Actor told Petrungaro that he personally took the vehicle to the body shop, and that the shop's system would not allow them to write one estimate. The Actor said that the damages happened all at one time. He said that on the day of the accident, an unknown male knocked on the door and told his family that an older gentleman in a red truck had hit his parked vehicle twice and then left. According to the unknown male at the door, the gentleman driving the truck was attempting to unload items from the truck. He hit the rear first and then drove around and tried to back in again and hit the front of the Actor's car. The Actor said that he called the police and was informed to contact his insurance company if his car was drivable. The police did not respond.
- 6. On March 20, 2018, Erie Insurance Special Investigator Lauren Lackey contacted the Meadville Police Department. There was no record of a hit and run on March 16, 2018. However, there was a report of an accident on February 19, 2018 where Irwin was a driver. The police report number was 18-0001963.
- 7. On March 26, 2018, Lackey interviewed the Actor at his residence. He provided the following information:

Irwin never lived with the Actor. The only people living with the Actor were his father and brother. Irwin drove the Actor's Equinox to Dillaman Auto Body to get the estimate of damages because the Actor had a migraine headache. On the day of the accident, the Actor's girlfriend, , informed him that someone had just hit his car. The Actor did not witness the accident. There was no preexisting damages on the car, nor had it been involved in any other accident. The Actor was not familiar with Irwin having been in any accidents in February. The Actor took the vehicle to the body shop. They had to give him two separate estimates because there was too much damage. The Actor is the only person who has keys to the vehicle and they are always in his pocket. He called the police, but they did not respond.

- 8. Erie would not have covered the loss on February 19, 2018 because Irwin was listed as an excluded driver on the policy.
- On March 26, 2018, Lackey interviewed Dillaman Auto Body employee Thomas Whalen. Whalen provided Lackey the following information:

Irwin brought the car in for the estimates. Whalen did not witness him driving it, however, he was the only person with the car. Irwin gave all of his information to June, the other employee. Irwin then spoke with Whalen. He told Whalen that he had two different losses. Somebody hit the front end of his vehicle a few weeks ago and then was rear-ended the night before he had the estimates done. That person hit him and took off. Whalen gave Irwin two separate estimates because he was told that there were two separate losses. It was not the shop's practice to do multiple estimates unless the customer said that they needed them separate. He described Irwin as a



Docket Number: CR-053-19	Date Filed: 2 20	4 680	N/LiveSca 207-	n Number ♂		Complaint/Incident Number IF20180121	
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younger male with a full head of darker hair in his mid-twenties.

- D. Your Affiant interviewed Dillaman Auto Body shop employees Thomas Whalen and June Deeter. They provided the following information:
 - 1. Deeter is the co-owner of Dillaman Auto Body. She worked the front reception area and greeted Irwin when he brought the car in for the estimate. She did not request to see identification. He verbally identified himself as Brandon Irwin. She entered that into the computer along with the vehicle identification number, license plate, mileage, and production date. She then provided that information to Whalen. She described the person identifying himself as Irwin as a younger male with dark hair. According to Deeter's work log, Irwin had the two estimates for the 2010 Chevrolet Equinox done on March 16, 2018 at 8:22 am.
 - Whalen is employed by Dillaman Auto Body as an estimator. He met with Irwin after receiving the original information from Deeter. The male he met with was a younger person in his twenties with dark hair. The reason that there were two separate estimates was because Irwin indicated to him that there were two separate losses and one would be covered by an insurance claim. The estimate for the front end damages was marked as customer pay. The estimate for the rear end damages was marked as a possible insurance claim. There was no insurance company listed. The damages were more extensive on the rear of the vehicle. They only write more than one estimate if there is an indication of more than one loss. If there was only one loss, there would only be one estimate. The amount of damages would not have anything to do with the number of estimates.
- E. Your Affiant received the Meadville Police Department Call Summary Sheet for incident number C18-0001963 which occurred on February 19, 2018 at 4:15 pm. There was no report written. The call was listed as an accident. The only person involved in the accident listed on the report was Brandon Irwin. The call notes indicate that it was a non-reportable motor vehicle accident with no injuries, and both vehicles were drivable.
- F. Your Affiant interviewed Erie Insurance Agent Connie Graff. She provided the following information:
 - 1. On December 13, 2017, she received a signed Named Person Exclusion Endorsement excluding Brandon Irwin from the Actor's policy that was signed and dated December 8, 2017.
 - 2. On March 16, 2018 at about 3:37 pm, the Actor called her office to report a claim. The Actor spoke with Graff and told her that one of his friends witnessed a car hit both the front and back of his vehicle and leave the scene. The Actor called the police, but they would not respond. The Actor already had two estimates of damages prior to calling Graff. According to the Actor, there were two estimates because the body shop said that they had to do it that way.
- G. Your Affiant interviewed Brandon Irwin. He provided the following information:
 - 1. In November of 2017, Irwin agreed to take over the Actor's car payments on the Actor's 2010 Chevrolet Equinox. They kept the vehicle in the Actor's name. Irwin was staying at the Actor's



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Docket Number: CR · O 5 3 - 19	Date Filed: 7_1201 / 9	OTN/LiveScan Number	Complaint/Incident Number	
Defendant Name:	First:	Middle:	Last:	
Defendant Name:	LEWIS	EDWARD	BENTLEY JR	

house at the time of the agreement. He lived there approximately a month. Because they were leaving the car in the Actor's name, the Actor attempted to add Irwin to his car insurance. He was denied due to Irwin's criminal history, however, Irwin was unaware that he was then listed as an excluded driver.

- 2. Irwin confirmed that after they made the agreement, Irwin was the one driving the car the majority of the time. Irwin was involved in a car accident on February 19, 2018 when he rear-ended another car. There was front end damage on the Equinox as a result of that accident. The Actor was with him at the time of the accident. Irwin was unable to remember who was driving at the time of the accident.
- 3. Irwin was not present in March when the car was hit while parked in front of the Actor's house. However, Irwin confirmed that the damage to the front end of the vehicle was from the accident in February.
- 4. Irwin took the car to Dillaman Auto Body for the estimates at the Actor's request. Irwin requested two separate estimates because he knew that the damages to the front end were not related the rear end damages.
- H. Your Affiant interviewed the Actor at his residence. He provided the following information:
 - In November of 2017, the Actor and Irwin made an agreement that Irwin would take over the payments of the Actor's 2010 Chevrolet Equinox. The car would remain in the Actor's name.
 - The Actor attempted to add Irwin to his car insurance policy because he was going to be driving the Actor's car. His insurance agent told him that they could not add Irwin to the policy because of his criminal history.
 - 3. The Actor signed a form with Erie Insurance indicating that he was aware that Irwin would be an excluded driver on his policy and therefore was not permitted to operate the vehicle while it was insured by Erie.
 - 4. The Actor admitted that Irwin drove the car on February 19, 2018 and was involved in a vehicle accident. Irwin rear-ended a car in front of him and caused front end damage to the Equinox.
 - 5. Irwin took the car to the auto body shop after the car was hit in front of the Actor's house in March of 2018.
 - 6. The Actor admitted that the front end damage was from the February accident when Irwin was driving the car and not the March accident.

Based upon information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Lewis Edward Bentley, Jr.

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Da	le -		<u>, , , , , , , , , , , , , , , , , , , </u>				District Judge	
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My commission expires first Monday of January, /- 20 22

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: BEDFORD COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 57-3-02 VS. MDJ: Hon. H. Cyril Bingham Jr. (NAME and ADDRESS): Address: 120 West John Street MAKAYLA MOCK: Bedford, Pa 15522 First Name Middle Name Last Name Gen 109 RESERVOIR RD Telephone: (814)623-6918 BEDFORD, PA 15522 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: ☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION **Docket Number** Date Filed OTN/LiveScan Number Complaint/incident Number Request Lab Services? CR-38-2019 03/01/19 U 683936-1 ☐ YES ☒ NO IF-2018-0199 GENDER ров 12/06/1996 ров Ра Co-Defendant(s) Add'l DOB ☐ Male First Name Middle Name Last Name Gen. AKA RACE White Hispanic Asian Black ☐ Native American Unknown ETHNICITY Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purole) BRO (Brown) Hair BLK (Black) ONG (Orange) XXX (Unk./Bald) ☐ WHI (White) Color GRN (Green) PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) Eye BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazei) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA ☐ YES ⊠ NO **DNA Location** WEIGHT (lbs.) **FBI Number** MNU Number 110 Defendant Fingerprinted ☐ YES □ NO Ft. HEIGHT In. Fingerprint Classification: 3 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'i Veh. School Veh. Oth. NCIC Veh. Code Reg. Plate # KSM0374 mat PA Ind. Sticker (MM/YY) same as VIN Def. Year Make Model Style Color 1FAHP34N76W174455 2006 | Ford Focus 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 filling. See Pa.R.Crim.P. 507). SDAG DENNIS KISTLER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SA JAMES KOPERA 438 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above \square 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 [401] 109 Reservoir Rd, Bedford, Pa 15522 (Subdivision Code) (Place-Political Subdivision) in BEDFORD County 1051 on or about JUNE 27, 2018 AND DATES THEREAFTER (County Code)

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Docket Number: CR-38-2019	Date Filed: 03/0/1//19		iveScan Number		Complaint/Incident No	umber
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-38-2019	03/01/19	U 683936-1	IF-2018-0199
Defendant Name:	First:	Middle:	Last:
Delendant Name,	MAKAYLA	L	MOCK

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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

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

(Date)

(Signature of Affiant)

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

(Magisterial District Court Number)

(Magisterial District Court Number)

Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number CR-38-2019 03/01//19 U 683936-1 IF-2018-0199 First: Middle: Last: Defendant Name: MAKAYLA MOCK

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

June 27, 2018 and dates thereafter

Criminal Complaint No:

IF-2018-0199

Name of Affiant:

Special Agent James Kopera

Law Enforcement Agency: Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 564 Forbes Avenue Pittsburgh, PA

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since April 2007, is the case agent assigned to the investigation involving the Actor, Makayla L. Mock.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Byron Edgecomb of Agency Insurance Company. The investigation revealed that the Actor, Makayla Mock, struck a deer at 11:37 PM on June 26, 2018. The Actor contacted Agency Insurance and added comprehensive and collision coverage to her policy at 11:12 AM on June 27, 2018. The Actor and/or Levi Logsdon then filed a claim with Agency Insurance on July 11, 2018 and claimed that the Actor struck a deer on July 10, 2018, at a time after the Actor obtained comprehensive and collision coverage, when in fact, the accident occurred prior to obtaining the comprehensive and collision coverage.
- C. Your Affiant reviewed the Agency Insurance Company file and spoke with Byron Edgecomb, Special Investigator with Agency Insurance Company, and found the following:
 - 1. The Actor purchased a liability only insurance policy for a 2006 Ford Focus on May 17, 2018 with Agency Insurance Company.
 - 2. The Actor added comprehensive and collision coverage to the policy on June 27, 2018 at approximately 11:12 AM.
 - 3. Levi Logsdon contacted Agency Insurance Company on July 11, 2018 and filed a claim on behalf of the Actor. Logsdon stated that the accident occurred the previous night on July 10, 2018.
 - 4. The Actor provided a recorded statement to Agency Insurance Company on July 16, 2018 and stated that the accident occurred on July 10, 2018. The Actor sent photographs the night of the accident and the metadata showed the pictures were taken on June 26, 2018 at 11:54PM, confirming the photographs were taken prior to the Actor adding comprehensive and collision insurance to her policy.



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Docket Number:	Date Filed:	0	TN/LiveScan Number	Complaint/Incident Number	
CR-38-2019	03/01//19	ับ 6839.		IF-2018-0199	
Defendant Nama	First:		Middle:	Last:	
Defendant Name:	MAKAYLA		L	MOCK	

- 5. Byron Edgecomb provided your Affiant with the original photographs sent by the Actor. The photograph metadata was analyzed by Supervisory Special Agent John O'Brien of the Pennsylvania Office of Attorney General. The report submitted by O'Brien verified the photographs were taken on June 26, 2018 at 11:54 PM.
- 6. In a recorded call from Agency Insurance Company Logsdon stated that the accident occurred at a time after the Actor obtained comprehensive and collision coverage. Specifically, Byron Edgecomb of Agency Insurance Company told him that the Actor obtained her insurance coverage on June 27, 2018, and then asked Logsdon if the accident occurred before or after that date. Logsdon stated that he was 100 percent sure the accident occurred after that date. Logsdon further verified that he did call in the claim on July 11, 2018.
- D. Bedford PA State Police provided the following information to your Affiant:
 - 1. Accident report PA 2018-716104 written by PA State Trooper Rusty Hays was provided to your Affiant. The report verifies the accident involving the Actor occurred on June 26, 2018 at 11:37 PM.
 - 2. The vehicle, a 2006 Ford Focus, was being operated by the Actor at the time of the accident.
- E. Levi Logsdon provided the following information to your Affiant:
 - 1. Logsdon stated sometime in the summer of 2018 his mother, Kim Clites, received a phone call from the Actor close to midnight. The Actor told his mother that she had struck a deer and asked if she could come and help her. His mother then contacted him and both he and his mother drove to Buffalo Mills and met the Actor. Logsdon stated that when they got to the accident scene an ambulance was treating the Actor and the police were there. He could not recall what police department. He stated that after she was treated, she and his mother drove her car, a 2006 Ford Focus, to her house and Logsdon followed behind them. He stated that he could not recall the date of the accident but recalled that sometime after the accident the Actor dropped her car off at his house where it was examined by her insurance company.
 - 2. Logsdon stated that sometime after the accident he recalled that the Actor had asked his mother if she would call in the claim to her insurance because she did not know what to do. At some point his mother then asked him to call in the claim. He stated that he did call the Actor's insurance company and told them that the accident occurred the night before. He stated he could not recall any of the dates but he did acknowledge that the accident could not have occurred the night before he called the insurance. He agreed that the accident must have occurred earlier than he told the insurance company. He ultimately admitted the accident did not happen the night before he called in the claim.
- F. The Actor provided the following information to your Affiant:
 - 1. The Actor stated that on or about June 26, 2018, she left work at Wal-Mart and was traveling home on route 96 when a deer ran across the road and struck her 2006 Ford Focus. She stated that after the deer hit, she pulled off the road and called Kim Clites, the mother of her ex-boyfriend, Levi Logsdon. She stated that an ambulance and the PA State Police arrived.



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Docket Number:	Date Filed:	0.	TN/LiveScan Number	Complaint/Incident Number
CR-38-2019	03/01/19	บ 6839		IF-2018-0199
Defendant Name:	First:		Middle:	Last:
Deletidate Name:	MAKAYLA		L	MOCK

When talking to Clites, she asked if she could come to the accident scene and help her get home.

- 2. Clites arrived on the scene along with Levi Logsdon. The Actor stated that she and Clites then drove her car to her house and Logsdon followed behind them. The following day, the Actor realized that she only had liability coverage on her car so she called her insurance company and added comprehensive coverage so that her insurance would cover the cost of repairs. She stated that she knew it was wrong but that she panicked and knew she did not have the money to get the car fixed.
- 3. A day or two after the accident the Actor drove the car to Logsdon's house, hoping that he would be able to fix it. She stated that about two weeks after the accident she contacted Clites and Logsdon and asked them to call her insurance company and give them a wrong date and time of the accident.
- 4. The Actor stated that she instructed Logsdon to tell them the accident occurred on July 10, 2018 and that she would also tell the insurance that same date. She stated that she did speak to her insurance company and admitted that she told them the wrong date of the accident in hopes that they would pay for the damages.
- 5. The Actor verified that she took photographs of the damage to the car right after the accident and sent them to her insurance company. She also verified that there were no other accidents to her car between the day of the deer strike and the date the claim was filed.
- 6. The Actor stated that while the car was at Logsdon's house, an appraiser from her insurance company appraised the damage. A copy of the appraisal shows that the damage totaled \$1,296.57 and she had a \$500.00 deductible.
- G. Levi Logsdon was again interviewed by your Affiant after your Affiant obtained additional information from the Actor, and he provided the following information:
 - Logsdon was asked if the Actor contacted him and asked him to file a claim for her and lie about the day and time of the accident. Logsdon admitted that she did call him and told him what day and time to tell the insurance company so that they would cover the damages to her car.
 - 2. Logsdon stated that she promised him that when she got the insurance money he would be able to pay off the loan on her car. He admitted that he got a personal loan for approximately \$2,500.00 dollars and gave the money to the Actor so that she could purchase the Ford Focus. He stated that after getting the call from the Actor telling him to call her insurance company, he did make the call and lied to them in order for her to get money in hopes that she would help him pay off his loan.
 - 3. Logsdon verified that the day and time of the accident he told her insurance company was not the correct day and time of the accident.



Docket Number: CR-38-2019	Date Filed: 03/01//19	OTN/LiveScan Number U 683936-1	Complaint/Incident Number
Defendant Name:	First:	Middle:	Last:
perentiality and	MAKAYLA		MOCK

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Makayla Mock.

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

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

	C Kgo-fr	
Sworn to me and subscribed before me this First day of March	(Signature of Affiant)	
03/01/19 Date	, Magisterial District Judge	
My commission expires first Monday of January, 2022		
	SEAL	
My commission expires first Monday of January, 2022	SEAL	

COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: Hon, JAMES J HANLEY, JR, Magisterial District Number: 05-2-36 Address: 4371 MURRAY AVENUE

LOWER LEVEL REAR PITTSBURGH PA 15217

First Name

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

MARIE

D

(NAME and ADDRESS): RODRIGUÉZ

Middle Name

Last Name

Gen.

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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
		G 831108-5	IF20180191
Defendant Name	First: MARIE	Middle: D	Last: RODRIGUEZ

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.)

Inchoate Attempt Offense 18 901 A				Solicitation 18 902 A			Conspiracy 18 903		
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and was not entitled to lost wages., in violation of 18 Pa.C.S.§4117(a)(2).



Docket Number:	Date Filed:	OTN/LiveScan Number	er	Complaint/incident Number
		G 831108-5		IF20180191
Defendant Name	First: MARIE	Mi D	iddle:)	Last: RODRIGUEZ

Inchoate Attempt Offense 18 901 A				Solicitation 18 902 A			Conspiracy 18 903		
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Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		G 831108-5		IF20180191
Defendant Name	First: MARIE		Middle: D	Last: RODRIGUEZ

- 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 is comprised of the preceding page(s) numbered through
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently 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.)

	2/21/19 G/m Milu
(Date)	(Signature of Affiant)
AND NOW, on this date FBBI 2019	
An affidavit of probable cause must be completed before	e a warrant can be issued.
(Magisterial District Court Number)	AMES I. HANLEY, IR UDGE. IAMES I. HANLEY, IR UD

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				POLICE CRIMINAL COMPLAINT
Docket Number:	Date Filed:	OTN/LiveScan Number G 831108-5		Complaint/Incident Number
Defendant Name	First: MARIE		Middle: D	Last: RODRIGUEZ

AFFIDAVIT of PROBABLE CAUSE

WHEN:

Date when Affiant received information:

08/09/2018

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information: 08/09/2018

2. HOW:

- How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.): investigation and actor statements
- How the source of information knows this particular person committed the crime:

investigation and actor statements

How both Affiant and/or source of information knows that a particular crime has been committed: investigation and actor statements

WHAT CRIMES:

18 4117 A2 INSURANCE FRAUD

18 3922 A1 THEFT BY DECEPTION

18 4104 A TAMPERING WITH RECORDS OR IDENTIFICATION

4. WHERE CRIME(S) COMMITTED:

201 STANWIX STREET, PITTSBURGH, PA 15222

WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- 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
- Х This source made declaration against his/her penal interest to the above offense
- Affiant and/or other Police Officers corroborated details of the information



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		G 831108-5		IF20180191
Defendant Name	First: MARIE	ave traditioner	Middle: D	Last: RODRIGUEZ

Date of Violation:

March 7, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent William McKee

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office Pittsburgh, PA

A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since February 2006, is the case agent assigned to the investigation involving the Actor, Marie Rodriquez.

- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Brandt Salnick of Progressive Insurance. The investigation revealed that the Actor was involved in a hit and run accident when she was sitting on the side of the road in her vehicle. The Actor was injured as a result. Subsequently, the Actor filed a claim with her automobile insurer, Progressive Insurance. As part of her claim, the Actor claimed wage loss in the amount of \$4,000.00 because she was unable to work due to injuries sustained in the accident. Progressive discovered that the Actor was not employed at the time she was involved in the accident.
- C. Your Affiant reviewed the claim filed with Progressive Insurance and found the following:
- 1. On 2/25/2018 at approximately 2:48 PM the Actor was in her vehicle (2018 GMC Terrain) stopped on the berm of I-90 in New York while gathering money for the toll ahead. The Actor's vehicle was side swiped by a semi-truck. As a result, the Actor sustained injuries and her vehicle was damaged. The New York State Police responded to the accident scene. The Actor's vehicle was towed from the scene. The tow truck driver drove the Actor to UPMC Hamot Hospital in Erie, Pennsylvania where she was admitted. The Actor sustained a concussion and neck injury. The Actor was released from the hospital on 2/28/2018. After being released, the Actor caught a 12:50 PM Greyhound bus from Erie to Pittsburgh. While on the bus, the Actor telephoned her auto insurer (Progressive) at approximately 3:57 PM to report the accident and file a claim. The Actor reported lost wages as part of her insurance claim.
- 2. On 3/27/2018 the Actor provided a copy of a paystub indicating that she was employed at Urban Design Associates and that she earned \$6,500.00 for the month of January. During the claim process, the Actor informed Progressive that she was on bed rest. On 4/23/2018 Progressive issued the Actor a check for \$4,000.00 for wage loss. The Actor received \$2,000.00 for lost wages between 2/25/18-3/24/18 and \$2,000.00 for lost wages between 3/25/18-4/24/18.
- On 5/4/2018 the Actor informed Progressive that she remained off work and that her return to work date was 5/10/18.
- 4. On 5/11/18 Gail Armstrong of Urban Design Associates (UDA) informed Progressive that the Actor was not employed at UDA. Armstrong said that UDA has 17 employees and that the Actor was never one of them.
- D. Your Affiant interviewed Barry Long and he provided the following information:



Docket Number:	Date Filed:	OTN/LiveScan Number G 831108-5		Complaint/Incident Number
Defendant Name	First: MARIE		Middle: D	Last: RODRIGUEZ

- 1. Long is the President and CEO of Urban Design Associates (UDA) located at 3 PPG Place, 3rd Floor, Pittsburgh, PA 15222.
- 2. Long said that the Actor was never an employee of UDA and he does not know who she is. Long viewed an Earnings Statement provided to Progressive by the Actor, purportedly from UDA. Long advised that the document is not legitimate and that UDA does not generate earnings statements in that manner.
- E. Your Affiant, along with Special Agent Jason Chimile, interviewed the Actor at her residence and she provided the following information:
- 1. On 2/25/2018 the Actor was traveling through New York while operating her vehicle when she pulled over on the side of the road. While she was sitting in her vehicle on the side of the road, the Actor's vehicle was struck/side swiped by a tractor trailer. As a result of the accident, the Actor was injured and hospitalized for a few days.
- 2. As a result, the Actor filed a claim with her insurance carrier, Progressive Insurance Company. As part of her claim, the Actor indicated that she was employed at Urban Design Associates (UDA) located at PPG Place in Pittsburgh, and that she suffered lost wages.
- 3. The Actor acknowledged that she was not employed at the time of the accident and was never an employee of UDA. The Actor provided a fraudulent Earnings Statement purportedly from UDA in the amount of \$6,500.00. As a result, Progressive paid her \$4,000.00.
- 4. The Actor said that she would take out a loan to pay the money back to Progressive.



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		G 831108-5		IF20180191
Defendant Name	First: MARIE		Middle: D	Last: RODRIGUEZ

I, WILLIAM MCKEE , 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.

Sworn to me and subscribed before me this 2/ day of , FETROREY . ZETY

Magisterial District Judge

My commission expires first Monday of January,

Magisterial District Judge

I HANLEY, IR JUDGE

MAGISTERIAL DISTRICT 05-2-36

MAGISTERIAL DISTRICT 05-2-36

MAGISTERIAL DISTRICT 05-2-36

MY COMMISSION EXPIRES ON THE

MAGISTERIAL DISTRICT 05-2-36

MY COMMISSION IN JUNUARY, 2024

MY COMMISSION IN JUNUARY, 2024

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: INDIANA COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 40-3-03 VS. MDJ: Hon. Jennifer Rega DEFENDANT: (NAME and ADDRESS): Address: 147 East Market Street, Blairsville, RICO COLLINS Pennsylvania 15717 First Name Middle Name Last Name Gen. 31 South Walnut Street, Blairsville, Pennsylvania 15717 Telephone: (724)459-7203 NCIC Extradition Code Type □ 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. D-Misdemeanor No Extradition 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ. DEFENDANT IDENTIFICATION INFORMATION Complaint/Incident Request Lab Docket Number Date Filed OTN/LiveScan Number SID Number 19 Services? .33 U676232-1 IF-2017-0126 ☐ YES ☐ NO Co-Defendant(s) **GENDER** ров 01/06/1971 Place of Birth Add'I DOB Male First Name Middle Name Last Name Gen. ☐ Female AKA ☐ White ☐ Hispanic RACE Asian ⊠ Black ☐ Native American Unknown ETHNICITY Non-Hispanic Unknown ☐ BLN (Blonde / Strawberry) ☐ BLU (Blue) BLK (Black) BRO (Brown) GRY (Gray) GRN (Green) Hair \square xxx PNK (Pink) Color PLE (Purple) ONG (Orange) RED (Unk./Bald) SDY (Sandy) WHI (White) BLK (Black) BLU (Blue) BRO (Brown) Eve GRN (Green) GRY (Gray) Color HAZ (Hazel) MAR (Maroon) PNK (Pink) ☐ MUL (Multicofored) XXX (Unknown) **Driver License** State License Number Expires Weight 235 lbs. Defendant Fingerprinted ☐ YES ☐ NO FBI Number Height 5 Ft. 9 in. Fingerprint Classification MNU Number DNA ☐ YES □ NO **DNA Location** Defendant a Veteran? ☐ YES ☐ NO DEFENDANT VEHICLE INFORMATION Registration State Hazmaf Commercial Veh. School Veh. Oth. NCIC Veh. Code Rea. Plate Number Sticker П same as (MM/YY) VIN Def. Make Year Model Style Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG JEROME A. ORIE (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SPECIAL AGENT RICHARD GRANDE (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. | 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

in INDIANA County

Pennsylvania

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [402]

(County Code)

[32]

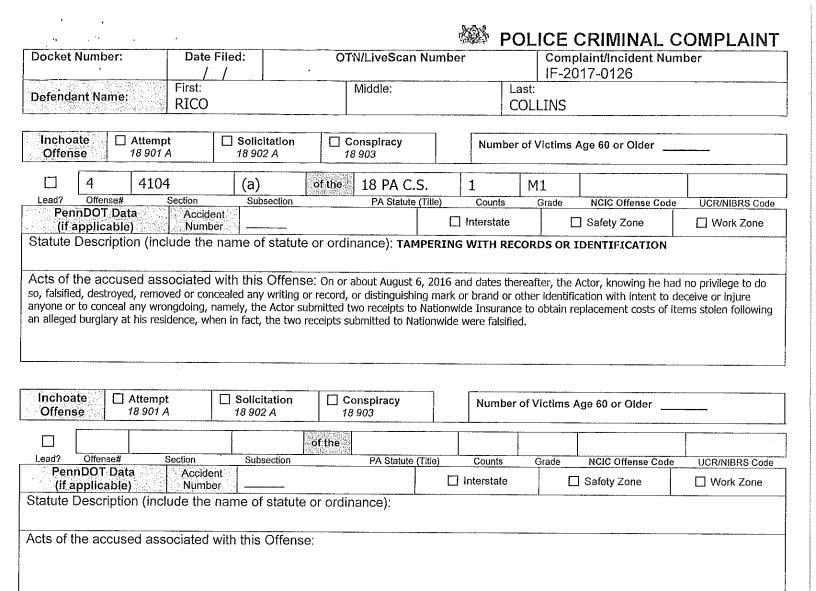
31 South Walnut Street, Blairsville.

(Place-Political Subdivision)

on or about AUGUST 6, 2016 AND DATES THEREAFTER



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Docket	Number:	Da	e Filed / /	f:	,	ΓN/LiveScan I	Numbe	r		Complaint/Incident	Number
Defend	ant Name:	First:)	·		Middle:	•		Last: COLL		
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Number of Victims Age 60 or Older

Conspiracy

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☐ Attempt

☐ Solicitation

	POLICE	CRIMINAL	COMPLAINT
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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2017-0126
Defendant Name:	First: RICO	Middle:	Last: COLLINS

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{4}$.

The acts committed by the accused, as listed of Pennsylvania and were contrary to the Act (Before a warrant of arrest can be issued, issuing authority, and attached.)	(s) of the Assembly, or in violation of	the statutes cited
	2/8/19	R. Mil
(Date) (e)	(Signature of Affiant)
AND NOW, on this date 2819	l certify that the complain	it has been properly completed and verified.
An affidavit of probable cause must be completed	before a warrant can be issued.	
40-3-03 (Magisterial District Court Number)	(Issuing Authority)	Jannifer à Reda District Malice Maglestechie, PA 16717 Distreville, PA 16717 y Commission Equies January 2020
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Docket Number:	Date Filed:	0.	TN/LiveScan Number		Complaint/Incident Number
*		,			IF-2017-0126
Defendant Name:	First:		Middle:	Last	
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AFFIDAVIT of PROBABLE CAUSE

DATE OF VIOLATION:

August 6, 2016 and dates thereafter

CRIMINAL COMPLAINT NO:

NAME OF AFFIANT:

Special Agent Richard Grande

Law Enforcement Agency: Insurance Fraud Section Western Regional Office 564 Forbes Avenue Pittsburgh, PA

Pennsylvania Office of Attorney General

- A. Your Affiant, Richard Grande, is a Special Agent with the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office. Your Affiant has a combined twenty seven (27) years of experience in law enforcement as a Police Officer/Detective and Special Agent and is the case agent assigned to this investigation involving the Actor, Rico Collins.
- B. This investigation was initiated by the Western Region Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Thomas Cesario of Nationwide Insurance, Special Investigation Unit. It was alleged that the Actor submitted two fabricated receipts as proof of property ownership stating those items were stolen in a burglary. One receipt was written out for an entire collection of R&B albums that totaled \$7,200.00. The other was written out for 188 DVD singles that totaled \$2,657.18.
- C. Your Affiant reviewed the claim filed with Nationwide Insurance by the Actor and found the following:
 - 1. On August 6, 2016, at 12:34 p.m., the Actor called Nationwide Insurance to file a renters' claim for a burglary to his apartment. The Actor talked to Nationwide Insurance Claims Representative, Michelle Goldman. The Actor told her that he just got home that day from being out of town for the past three weeks and his apartment had been burglarized. The Actor related that several items were stolen from inside to include: jewelry, cash, electronics, CDs, DVDs, and a complete record collection. Goldman asked him if he filed a police report. The Actor replied "yes, Blairsville Police took a report". She advised him that he would need to provide proof of ownership for items stolen as part of the claims process. The Actor's policy was incepted on January 26, 2016.
 - 2. On August 22, 2016 the Actor submitted a Sworn Statement in Proof of Loss to Nationwide Insurance as part of his claim. The Actor listed all the items that were alleged to have been stolen in the apartment burglary to include the following: A complete R&B record collection, 188 DVD movies, a laptop computer, jewelry, \$1500.00 in cash, and two ladies purses. The Actor listed his total value of loss at \$25,000.00. The Actor had the document notarized on August 12, 2016 by Leslie C. Jones, Notary Public of Aliquippa, Pennsylvania.
 - 3. On October 10, 2016 Thomas Cesario, a Special Investigator with Nationwide Insurance met with the Actor. Cesario conducted a recorded interview with the Actor. Cesario went over what had occurred on August 6, 2016 when the Actor discovered his apartment burglarized. The Actor stated that he was out of town visiting relatives in Chicago for two weeks around July 2016. When he returned home on August 6, 2016, he discovered his apartment burglarized. The Actor stated that he filed a police report with the Blairsville Police Department.
 - 4. On November 1, 2016 Nationwide paid the Actor \$11,209.75 without receipts. This was for the items listed on his Statement in Proof of Loss that he submitted. Michelle Goldman, a Claims Associate with Nationwide was contacted and stated that the amount was determined by depreciating his listed items by half in value. She also related that it was also minus a \$500.00 deductible.

POLICE	CRIMINAL	COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	/_/		IF-2017-0126
	First:	Middle:	Last:
Defendant varie:	RICO	77 A A A A A A A A A A A A A A A A A A	COLLINS

- 5. Goldman further stated that the Actor inquired as to why the amount paid for his claim was not the full \$25,000.00 he submitted. Goldman advised the Actor he would have to submit receipts for proof of loss to receive any further payment(s) on his claim. Goldman explained to the Actor that the \$11,209.75 was the maximum Nationwide could pay on the claim without receipts.
- 6. On February 23, 2017 the Actor submitted copies of two receipts for items he alleged were stolen in the burglary claim. Special Investigator Cesario was able to verify that the two receipts submitted by the Actor from stores in Illinois were fabricated. Cesario sent Special Investigator, Phillip Michael Thomas, from their Chicago office to the address of stores identified on the receipts. A receipt was from the Disc Replay Store, located at Hillcrest Shopping Centre, 1701 North Larkin Avenue, Crest Hill, Illinois. The receipt was for a complete R&B record collection that totaled \$7,200.00. The other receipt was from Reckless Records, located at 26 East Madison Street, Chicago, Illinois. The receipt was for 188 DVD singles collection that totaled \$2,657.18.
- D. On September 6, 2017 your Affiant, along with Supervisory Special Agent Robert Gift, went to the Blairsville Police Department. Your Affiant spoke to Chief David Allman who verified that Officer Jill Gaston filed report #16001094 on August 6, 2016 for a burglary. This was based on information received from the Actor and the information contained in the report was correct.
 - 1. Your Affiant reviewed the burglary report filed by the Actor with Blairsville Police. The report #16001094 did not specifically list an R&B record collection valued at \$7,200.00 that the Actor claimed with Nationwide was stolen from his apartment.
- E. On September 29, 2017 your Affiant was able to make contact with Nationwide Insurance Special Investigator, Phillip Michael Thomas. He provided the following information:
 - Thomas conducted follow up interviews in the Chicago area in reference to this claim investigation at the request
 of Special Investigator Thomas Cesario. Thomas stated that on March 14, 2017 he went to the Disc Replay
 Store and talked to manager, Scott Gregory. Thomas showed him receipt #540616 made out for \$7,200.00.
 The receipt was written out for an entire R&B record collection. Scott confirmed that the receipt was bad and
 not from their store.
 - 2. Thomas indicated on March 15, 2017 he went to Reckless Records and talked to manager, Billy Smith. Thomas showed him receipt #0689115 made out for \$2,657.18. The receipt was written out for 188 DVD singles. Smith was able to confirm that the receipt was bad and not from their store. Smith also advised Thomas that they do not provide handwritten receipts.

Based on the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Rico Collins.

I, SPECIAL AGENT RICHARD GRANDE, 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.

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Docket Number:	Date Filed: / /	01	ΓΝ/LiveScan Number	,,	Complaint/Inciden	it Number
Defendant Name:	First: RICO		Middle:	Last: COL	LINS	
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Address: 401 Candlelight Drive, #120

COUNTY OF: CAMBRIA

Magisterial District Number: 47-3-07

MDJ: Hon. Frederick S. Creany

COMMONWEALTH OF PENNSYLVANIA

To:818142476644



POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

DEFENDANT:

(NAME and ADDRESS):

RUSSELL First Name

EDWARD MAY Middle Name

Last Name

Gen

Ebensburg, Pennsylvania 15931

Telephone: (81	L4)472-6	661				295 McCli	insey	Road, Ebe	ensbu	ırg, Pennsy	lvania 15	5931	
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Docket Number:	Date Filed:	OTN/LiveScan Number		Criminal Complaint Complaint/Incident Number IF-2018-0143
Defendant Name:	First: RUSSELL	Middle: EDWARD	Last: MAY	
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(Date)		Signature of Affiant)
AND NOW, on this date	I certify that the complaint has been pro	operly completed and verified.
An affidavit of probable cause must be completed before	ore a warrant can be issued.	
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Page: 4/7

Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/incident Number IF-2018-0143	
Defendant Name:	First: RUSSELL	Middle: EDWARD	Last: MAY		

8144711803

AFFIDAVIT of PROBABLE CAUSE

Dates of Violation:

May 14, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Richard Grande

Law Enforcement Agency:

Office of Attorney General Insurance Fraud Section Western Regional Office 1251 Waterfront Place Pittsburgh, PA 15222

- A. Your Affiant, Richard Grande, is a Special Agent with the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office. Your Affiant has a combined twenty seven (27) years of experience in law enforcement as a Police Officer/Detective/Special Agent and is the case agent assigned to the investigation involving the Actor, Russell May.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Brandt Salnick of Progressive's Special Investigations Unit. It was alleged that the Actor obtained insurance coverage after an accident and then provided false information as to the time of the accident. The attempted theft amount was in excess of \$2,000.00.
- C. Your Affiant reviewed the claim referral and file provided by Progressive Insurance and found the following:
- 1. The Actor purchased an auto policy in person with Progressive Insurance at the Laurel Insurance Management Office located in Ebensburg on May 14, 2018 at 3:37 p.m. The Actor then filed an accident claim stating that he struck two parked vehicles on May 14, 2018 after purchasing the insurance coverage.
- 2. On May 15, 2018 the Actor contacted Progressive Insurance and stated that he was taking his vehicle to RPM Auto, located at 3652 Benjamin Franklin Highway, Ebensburg, PA for service. The Actor stated that when he pulled into the parking lot he lost his brakes, and was unable to stop. The Actor advised that he struck two parked vehicles owned by Rich Machauta.
- 3. The Actor talked to the owner of RPM Auto, Rich Machauta, about the accident and exchanged contact information with him at that time. The Actor related that he told Machauta he would re-contact him shortly about the damage(s). The Actor stated that Machauta advised him to turn it into his insurance. The Actor was advised he would be contacted by a Progressive Claims Representative as part of their claims process.
- 4. The Actor was contacted by Progressive Insurance Claims Representative, Megan Huber. Huber went over the facts of the accident with the Actor on a recorded call. Huber asked the Actor when the accident happened. The Actor stated, Monday, May 14th around 3:30 p.m. - 4:00 p.m. Huber asked the Actor if this happened at RPM Auto. The Actor stated "ves".
- 5. Huber asked the Actor what happened. The Actor stated that he was pulling into the lot when he lost his brakes on his truck. He said that he struck two vehicles that were parked there and that the owner of RPM Auto, Rich Machauta, was working on. The Actor stated that there was damage to the parked cars, but no damage to his vehicle.
- 6. Huber asked the Actor if he set up his policy after the accident happened. The Actor stated that he got it right before. The Actor said that he went into an office and got it and then it happened. Huber asked the Actor what insurance office he went to. The Actor stated Laurel Insurance Management in Ebensburg, PA. Huber advised the Actor they would need to investigate the claim further to confirm his coverage.

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0143
Defendant Name:	First:	Middle:	Last:
	RUSSELL	EDWARD	MAY

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- C. Your Affiant reviewed the claim referral and file provided by Progressive Insurance and found the following:
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- On May 15, 2018 the Actor contacted Progressive Insurance and stated that he was taking his vehicle to RPM Auto, located at 3652 Benjamin Franklin Highway, Ebensburg, PA for service. The Actor stated that when he pulled into the parking lot he lost his brakes, and was unable to stop. The Actor advised that he struck two parked vehicles owned by Rich Machauta.
- 3. The Actor talked to the owner of RPM Auto, Rich Machauta, about the accident and exchanged contact information with him at that time. The Actor related that he told Machauta he would re-contact him shortly about the damage(s). The Actor stated that Machauta advised him to turn it into his insurance. The Actor was advised he would be contacted by a Progressive Claims Representative as part of their claims process.
- 4. The Actor was contacted by Progressive Insurance Claims Representative, Megan Huber. Huber went over the facts of the accident with the Actor on a recorded call. Huber asked the Actor when the accident happened. The Actor stated, Monday, May 14th around 3:30 p.m. 4:00 p.m. Huber asked the Actor if this happened at RPM Auto. The Actor stated "yes".
- 5. Huber asked the Actor what happened. The Actor stated that he was pulling into the lot when he lost his brakes on his truck. He said that he struck two vehicles that were parked there and that the owner of RPM Auto, Rich Machauta, was working on. The Actor stated that there was damage to the parked cars, but no damage to his vehicle.
- 6. Huber asked the Actor if he set up his policy after the accident happened. The Actor stated that he got it right before. The Actor said that he went into an office and got it and then it happened. Huber asked the Actor what insurance office he went to. The Actor stated Laurel Insurance Management in Ebensburg, PA. Huber advised the Actor they would need to investigate the claim further to confirm his coverage.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0143
Defendant Name: First: RUSSELL		Middle: EDWARD	Last: MAY

- D. Your Affiant, along with Special Agent Amy Adams, conducted an interview with witness, Rich Machauta, at his business, RPM Auto located in Belsano, PA. He provided the following information.
- Your Affiant advised Machauta that this was a follow up to a recent accident involving two of his vehicles, and if he
 remembered it. Machauta related that he remembered the accident that occurred on May 14, 2018. He also
 stated that both vehicles involved were damaged.
- 2. Your Affiant asked Machauta to explain what happened. He said that the Actor was bringing in his truck for service. When the Actor was pulling into his lot he apparently lost his brakes. The Actor could not stop and struck the two parked vehicles. Machauta said that the Actor was unable to supply his insurance information at that time, but did give him his contact information.
- 3. Your Affiant asked Machauta if he remembered what time the accident occurred. Machauta stated that it was around 3:00 p.m. He also showed me a copy of his security video camera system that captured the accident. Your Affiant viewed the video which showed the Actor's truck pull into the RPM Auto lot and strike the parked vehicles.
- 4. The video is date/time stamped and showed that the accident occurred on May 14, 2018 at 14:58 p.m. Your Affiant asked Machauta if the date/time stamp on his system was correct. He stated that it has always been set correctly and has been on time. Machauta supplied me with a copy of the video and also an estimate of his damages which totaled \$4,508.18.
- E. Your Affiant, along with Special Agent Amy Adams, conducted an interview with Laurel Insurance Management agent, Rich Nedresky. He provided the following information.
- Nedresky was able to verify that the Actor purchased an auto policy in person at his office on May 14, 2018 at 3:37 p.m. The policy was a full coverage commercial type policy due to the type of vehicle the Actor was driving at that time.
- F. Your Affiant, along with Special Agent James Kopera, conducted an interview with the Actor. He provided the following information.
 - Your Affiant advised the Actor that this was a follow up regarding a recent accident he was involved in at RPM Auto. The Actor said that he remembered the accident and that it occurred on May 14, 2018. Your Affiant asked the Actor to explain what happened.
- 2. The Actor stated that he was driving his Ford truck to RPM Auto for service. He said that he was pulling into the lot when he lost the brakes and was unable to stop. The Actor related that he struck two parked vehicles that were in the lot causing damage to them, but not to his truck.
- 3. The Actor stated that he talked to the owner of RPM Auto, Rich Machauta, and gave him his contact information for the accident. Your Affiant asked the Actor if his vehicle was insured at the time of the accident. The Actor stated "no". Your Affiant asked the Actor if he went to his local insurance agency right after the accident to get a policy. The Actor stated "yes". The Actor purchased a full coverage commercial type insurance policy.
- 4. Your Affiant asked the Actor if he remembered filing an accident claim. The Actor stated "yes". Your Affiant then asked the Actor if he remembered what time he told Progressive Insurance the accident happened. The Actor stated that he did not remember. Your Affiant then asked the Actor if he purchased the policy after the accident happened to cover the damages from the previous accident. The Actor stated "yes".

POLICE CRIMINAL COMPLA	INT
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Docket Number: Date Filed:		OTN/LiveScan Number	Complaint/Incident Number IF-2018-0143
Defendant Name:	First:	Middle:	Last:
	RUSSELL	EDWARD	MAY

Based on the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Russell May.

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

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

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

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: WESTMORELAND **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 10-3-11 VS. MDJ: Hon. Roger Eckels (NAME and ADDRESS): Address: 2320 Mount Pleasant Road, Mount RYAN **FUTCHKO** First Name Middle Name Last Name Pleasant, Pennsylvania 15666 511 Heckla Road, Mount Pleasant, Pennsylvania 15666 Telephone: (724)423-7150 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Request Lab Services? CR-34-19 2/28/19 U 683367-6 YES NO IF-2018-0167 **GENDER** Co-Defendant(s) ров 04/28/1992 Add'I DOB Male Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☑ White Asian Black Native American Unknown ETHNICITY ☐ Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) ☐ PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) ☐ PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Grav) Eve Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) ☐ MUL (Multicolored) XXX (Unknown) DNA **DNA Location** ☐ YÉS ☐ NO WEIGHT (lbs.) FBI Number **MNU Number** 210 Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 0 DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. mat Ind. .Plate # same as Sticker (MM/YY) 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). DENNIS A. KISTLER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SPECIAL AGENT RICHARD GRANDE (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above □ I accuse the defendant whose name is unknown to me but who is described as ☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [416] 511 Hecla Road, Mount Pleasant, (Place-Political Subdivision) (Subdivision Code) Pennsylvania in WESTMORELAND [65]on or about JUNE 1, 2018 AND DATES THEREAFTER County (County Code)



Docket Number: CR-34-19	Date Filed: 2/28/19	отн и 683367	/LiveScan Number –6		Complaint/Incident Number IF-2018-0167	
Defendant Name:	First: RYAN	N	Įiddle:	Last FUT	t: TCHKO	127

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

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the

issuing authority, and attached.)

AND NOW, on this date

February 28, 2019

(Date)

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

(Signature of Affiant)

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

10-3-11

(Magisterial District Court Number)

(Issuing Authority)



Docket Number: CR-34-19	Date Filed: 2/28/19/	OTN/LiveScan Number U 683367-6		Complaint/Incident Number IF-2018-0167
Defendant Name:	First: RYAN	Mįddle:	L'ast:	: CHKO

AFFIDAVIT of PROBABLE CAUSE

Dates of Violation:

June 1, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Richard Grande

Law Enforcement Agency:

Office of Attorney General Insurance Fraud Section Western Regional Office 1251 Waterfront Place Pittsburgh, PA

- A. Your Affiant, Richard Grande, is a Special Agent with the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office. Your Affiant has a combined twenty seven (27) years of experience in law enforcement as a Police Officer/Detective/Special Agent and is the case agent assigned to the investigation involving the Actor, Ryan Futchko.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Ashley Fagan of Progressive's Special Investigations Unit. It was alleged that the Actor obtained insurance coverage after an accident and then provided false information as to the time of the accident. The amount of the attempted theft was in excess of \$2,000.00.
- C. Your Affiant reviewed the claim referral and file provided by Progressive Insurance and found the following:
- The Actor went online and incepted a new comprehensive/collision auto policy with Progressive on June 1, 2018 at 8:22 p.m. The Actor's Safe Auto Insurance policy had expired on October 4, 2017. On June 4, 2018 a claimant, Daniel Miele, contacted Progressive Insurance and talked to claims representative, Katie Oritz. Miele filed an accident claim under the Actor's policy #922106213.
- 2. Miele stated he parked his vehicle on Main Street in Mount Pleasant, PA. to pick up food at a local restaurant. When he came back outside the Actor had backed into the rear bumper of his truck causing damage. Miele stated the Actor could not provide any insurance information at that time, so they exchanged contact information. Miele then said later in the evening on June 1, 2018 the Actor called him and provided him his Progressive Insurance policy #922106213 for the accident. Miele was asked when the accident occurred. He stated June 1, 2018 around 7:10 p.m.
- 3. Miele was asked how he was sure of the time. He said that he had the Actor call his cell phone a short time after the accident while they were still on scene to verify his number. Miele stated that his cell phone call log showed the call from the Actor's cell phone was received on June 1, 2018 at 7:49 p.m. Miele was asked to supply Progressive Insurance with a copy of his cell phone call log record, which he did.
- 4. On June 5, 2018 Progressive Insurance Claims Adjuster, Sandra Young, made contact with the Actor on a recorded call to discuss the accident claim. The Actor stated that last Friday he was driving down the street when he rear-ended Miele's parked truck causing rear bumper damage.
- 5. Young then asked the Actor if any police were notified. The Actor stated "no". She asked the Actor what time the accident happened. The Actor stated "8:30 in the evening". She then asked the Actor if the accident happened before or after he got his policy. The Actor stated "it happened right after". Young advised the Actor that under the circumstances the claim would have to be investigated further.
- D. Your Affiant, along with SA James Kopera, conducted an interview with the witness, Daniel Miele. He provided the following information.



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number	
CR-34-19	2/28//19	U 683367-6		IF-2018-0167	-
Defendant N	First:	Middle:	Last:		
Defendant Name:	RYAN		FUTC	HKO	

- 1. Your Affiant advised Miele that this was a follow up investigation regarding a recent accident he was involved in on June 1, 2018. He said that he remembered the accident. Miele was asked to explain what happened. Miele stated that he had stopped at the Village Pizza Shop located on Main Street, Mount Pleasant, PA. around 7:00 p.m. and went in for a few minutes and picked up his food order.
- 2. When he came back outside he discovered that the Actor had backed into the right rear portion of his truck bumper causing damage. Miele also said that the bumpers of both vehicles were stuck together from the impact. Miele said that they were able to get the vehicles unstuck which took approximately (15) fifteen minutes. Miele then asked the Actor for his insurance information.
- 3. The Actor was unable to supply Miele insurance information at that time, but did give him his name and cell phone number. Miele had the Actor use his cell phone to call Miele's cell phone to verify that the contact number was legitimate. Miele stated that no police were notified as no one was injured and both vehicles were drivable. Miele said that later in the evening of June 1, 2018 the Actor called him and provided him with a Progressive Insurance policy #922106213 for the accident.
- 4. Miele then contacted Progressive Insurance to file a claim using the information provided to him by the Actor. Progressive asked Miele if he could verify the time of the accident. Miele advised Progressive Insurance of the phone call from the Actor's cell phone while they were still at the accident scene. Miele's cell phone call log showed the call from the Actor's cell phone being placed on June 1, 2018 at 7:49 p.m.
- 5. Miele provided Progressive Insurance with a screen shot of his cell phone log showing that call. Later Miele was advised by Progressive Insurance that his claim would be denied due to a coverage issue.
- 6. Your Affiant asked Miele how much damage was done to his vehicle. Miele stated his damages were approximately \$2,952.18 which he turned into his Selective Insurance Company. Miele stated he had to pay a \$250.00 deductible, and his vehicle was repaired at Dyson's Auto Frame located in Mount Pleasant, PA.
- E. Your Affiant was able to make contact with Eric Dodd, employee of Dyson's Auto Frame. He provided the following information.
- 1. Dodd was able to verify an estimate on Miele's vehicle. Dodd confirmed the \$2,952.18 estimate for repairs on Miele's vehicle were correct and the vehicle was fixed at Dyson's Auto Frame.
- F. Your Affiant, along with SA James Kopera, conducted an interview with a witness, Pressley Kitis. She provided the following information.
- 1. Kitis was asked if she remembered the June 2018 accident and what happened. Kitis stated that she was in the truck with the Actor when the accident occurred.
- 2. Kitis said that they were going to the Village Restaurant in Mount Pleasant, PA. when the Actor was trying to park and he struck another parked truck. The bumpers of both vehicles were stuck together from the impact.
- 3. Kitis said that the owner of the other truck came out of the restaurant and he talked to the Actor. They got the trucks unstuck and then exchanged contact information. Your Affiant asked Kitis if she remembered what time the accident occurred. She stated it was around 5:00 p.m. or 6:00 p.m.

Based on the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Ryan Futchko.

	POLICE	CRIMINAL	COMPL	AINT
A SOURCE	- OLICE	CITHAILIAVE	C. CHAIL F	

Docket Number:	Date Filed: 2/28/19	OTN/LiveScan Number	Complaint/Incident Number
CR-34-19		บ _. 683่367–6	IF-2018-0167
Defendant Name:	First: RYAN	Middle:	Last: FUTCHKO

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

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

	A. Drl	
	(Signature of Affiant)	
Sworn to me and subscribed before me this day of	February 2019	
My commission expires first Monday of January,	, Magisterial District Judge Commission of Westman Monday in January in Janu	

4		
X,	DOLLOE	CRIMINAL
-	PULICE	CRIMINAL

COMPLAINT

Docket Number:	Date Filed: OTN/LiveScan		TN/LiveScan Number		Complaint/Incident Number
CR-34-19	2/2/8/1/9	บ 683367–6			IF-2018-0167
	First:	-55	Middle:	Last	
Defendant Name:	RYAN			FUT	CHKO

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

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

	R. 13	rl	
	(Sign	nature of Affiant)	
Sworn to me and subscribed before me this day of	February	2019	
My commission expires first Monday of January,	Conn	nission Reger F. Eckels Roger	



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Docket Nu	mber:		Filed:			TN/LiveScan	Num	ber			plaint/Inciden	t Nun	nber
CR-34-	19	2/28	/19	U	<u>6833</u>	67-6			Lost		2018-0167		
Defendant	Name:	First:				Middle:			Last: FUT	CHKC)		
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the Actor state	ed that his ve	hicle was in	volved in an	accident a	it a tim	ne after he added	d insur	ance covera	ige, wh	nen in fa	act, the accident	occurr	ed prior to the Actor
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Acts of the ac	ccused ass	ociated v	ith this O	ffense:						850			1
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POLICE CRIMINAL COMP COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ERIE COMMONWEALTH OF PENNSYLVANIA VS. Magisterial District Number: 06-2-02 (NAME and ADDRESS): MDJ: Hon. Laurie A. Mikielski Address: 3608 West 26th Street **SABRINA** MICHELLE YOVICH Middle Name Last Name First Name Erie, PA 16506 12871 Route 19 S Apartment A Waterford, PA 16441 Telephone: (814)451-6518 NCIC Extradition Code Type C-Misdemeanor Surrounding States 1-Felony Full 5-Felony Pending Extradition ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/Incident Number Date Filed Docket Number YES NO IF-2018-0271 Co-Defendant(s) GENDER ров 02/06/1996 ров Ра Add'l DOB ☐ Male First Name Middle Name Last Name **AKA** RACE ☑ White Black Unknown Asian Native American **ETHNICITY** Unknown Hispanic ■ Non-Hispanic PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ■ BLN (Blonde / Strawberry)

BRO (Brown)

PNK (Pink)

GRN (Green)

■ MUL (Multicolored) XXX (Unknown) DNA **DNA** Location ☐ YES ☒ NO WEIGHT (lbs.) **FBI Number** MNU Number 150 **Defendant Fingerprinted** Ft. HEIGHT In. ☐ YES ⊠ NO Fingerprint Classification: 5 3 DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code State Haz Registration Comm'l Veh. School Veh. Reg. Plate # KGT6532 mat Ind. same as PA Sticker (MM/YY) 04/19 Def. VIN Make Year Model Style Color Ø <u>5XYKTDA25BG061140</u> 2011 Kia Sorento Suv Gold Office of the attorney for the Commonwealth \square Approved \square Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG JEROME ORIE (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) SPECIAL AGENT DAVID A. DALCAMO (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 [213] 2727 West 16th Street, Erie, PA Subdivision Code) (Place-Political Subdivision) 16505 in ERIE County [25] on or about OCTOBER 3, 2018 AND DATES THEREAFTER

BLK (Black)

HAZ (Hazel)

Eye Color BLU (Blue)

MAR (Maroon)

(County Code)

Gen

GRY (Gray)



t			A SAME A	OLICE CRIMINA	L COMPLAIN!	
Docket Number:	Date Filed:	OTN/LiveScan N	lumber	Complaint/Incident	i Number	
Defendant Name:	First: SABRINA	Middle: MICHELLE		_ast: YOVICH		
When there is more that (Set forth a brief summary or without more le not sufficier	an one offense, each of the facts sufficient to advis nt. In a summary case, you i time of the offense may be li	ffense should be num se the defendant of the natu must cite the specific section occurred if known. In addition	bered chronolo re of the offense(s n(s) and subsection, social security r) charged. A citation to the sta on(s) of the statute(s) or ordin numbers and financial informa	atute(s) allegedly violated, ance(s) allegedly violated.	
Inchoate				or Older		
☑ 1 4117	(a)(2)	of the 18 PA C.S.	1	F-3		
Lead? Offense Se	ection Subsection	PA Statute (Ti	tle) Counts	Grade NCIC Offense Code	UCR/NIBRS Code	
(if applicable)	Accident Number	_	☐ Interstate	☐ Safety Zone	☐ Work Zone	
Statute Description (inc	clude the name of state	ute or ordinance): INS U	IRANCE FRAUD			
presented or cause to be pre	and various dates thereafte sented to Esurance any state erning any fact or thing mate	er, the Actor did knowingly a tement forming a part of or terial to the insurance claim,	in support of any i namely, the Actor	to defraud an insurer or self- nsurance claim that contained told Esurance that her vehicle obtaining insurance coverage	I false, incomplete, or e was involved in an accident	
inchoate ⊠ Attemp			Numbe	er of Victims Age 60 or Olde	r	
Offense 18 901	A 18 902 A	18 903				
□ 2 392	连续性 网络克拉特特拉斯特 网络 网络克拉特斯拉克特斯 <u>亚拉尼斯</u>	of the 18 PA C.S	203-935; \$10-20-20; \$2,000-64-20:05; FD8-10-820	F-3	Code HODAUDE Code	
Lead? Offense# PennDOT Data	Section Subsection Accident Number ———	PA Statute (1	<u>Counts</u> ☐ Interstate	Grade NCIC Offense	Code UCR/NIBRS Code Work Zone	
(if applicable) Statute Description (inc	A SERVICE CONTRACTOR C	ite or ordinance): CRIM	INAL ATTEMPT/	THEFT BY DECEPTION		
Acts of the accused associated with this Offense: On or about October 3, 2018 and dates thereafter, the Actor did with the intent to commit the crime of Theft By Deception any act that constituted a substantial step towards the commission of that crime, namely, in an attempt to obtain in excess of \$2,000.00 from Esurance, the Actor told Esurance that her vehicle was involved in an accident at a time after she obtained insurance coverage, when in fact, the incident occurred prior to the Actor obtaining insurance coverage.						
Inchoate	ot Solicitation	☐ Conspiracy			_	
Inchoate ☐ Attemp Offense 18 901		18 903	Numbe	er of Victims Age 60 or Olde		
Lead? Offense#	Section Subsection	of the PA Statute (1	Fitle) Counts	Grade NCIC Offense	Code UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number ———	1 A Statute (1	☐ Interstate		☐ Work Zone	
	Statute Description (include the name of statute or ordinance):					
Acts of the accused associated with this Offense:						
Acts of the accused as:	sociated with this Offer	13 C .				

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number IF-2018-0271		
Defendant Name:	First: SABRINA	Middle: MICHELLE	Last: YOVICH		

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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.)

AND NOW, on this date

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

(Magisterial District Court Number)

(Signature of Affiant)

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

October 3, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent David A. Dalcamo

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 1251 Waterfront Place

Pittsburgh, PA

- A. Your Affiant, who has been employed as a Special Agent for the Pennsylvania Office Attorney General, Insurance Fraud Section, Western Regional Office, since February 2016, and has been a police officer in this Commonwealth since 1998, is the case agent assigned to the investigation involving the Actor, Sabrina Yovich.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Juan Vasquez, Special Investigator with Esurance. Vasquez provided this office with the following information:
 - 1. On October 3, 2018 at 4:22 pm, the Actor, Sabrina Yovich, purchased an automobile insurance policy from Esurance for her 2011 Kia Sorrento.
 - 2. On October 3, 2018 at 6:54 pm, a claim was filed on the Actor's policy with Esurance by a Robert Walter. Walter stated that his vehicle was rear-ended by the Actor. Walter also stated that the accident occurred on Interstate Route 79, and there were four vehicles involved in the accident. The Pennsylvania State Police responded and completed a report as some of the vehicles needed to be towed.
 - 3. On October 4, 2018 at 11:03 am, the Actor reported the claim to Esurance and stated the accident occurred on October 3, 2018 at 4:30 pm. The representative from Esurance asked the Actor if she had purchased the policy prior to being involved in the accident. The Actor stated that she did.
 - 4. Esurance re-interviewed Robert Walter and found that the accident actually occurred at or around 4:00 pm. Walter supplied a screen shot of his call log which showed that he called the 911 center to report the accident at 4:13 pm, prior to the Actor purchasing the insurance policy at 4:22 pm.
 - 5. Upon receiving a copy of the Pennsylvania State Police Crash Report, Esurance found that the accident occurred prior to the Actor purchasing the Esurance policy. The total amount of attempted theft is over \$2,000.00.
- C. On January 2, 2019, your Affiant conducted an interview with Special Investigator Juan Vasquez, Esurance, who provided the following information:
 - 1. Vasquez stated that due to the fact that the auto policy was purchased at 4:22 pm on October 3, 2018 and the accident was reported to have occurred at 4:30 pm, Esurance conducted an investigation as to the actual time of the accident.
 - 2. The Actor, in two separate recorded statements to Esurance, indicated that the accident occurred at 4:30 pm. The Actor further stated in the recordings that the accident occurred after she purchased the policy.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0271		
Defendant Name:	First: SABRINA	Middle: MICHELLE	Last: YOVICH		

- 3. Vasquez located a recorded phone call by the Actor in which she purchased the policy. The call began at 4:08 pm and lasted 17 minutes.
- 4. During the call, the Actor identifies herself as Sabrina Yovich and stated that she just needs to purchase insurance.
- 5. As the Customer Service Representative was going over the terms of the policy, the Actor interrupts the representative and asked for the policy number.
- 6. The policy was in place at 4:22 pm. The call was terminated at 4:25 pm.
- Vasquez stated that Esurance conducted a carrier discovery report and found that the Actor had a prior insurance policy with Progressive Insurance, which was cancelled on September 1, 2018.
- 8. Esurance conducted a follow-up interview with Robert Walter, the person who was rear-ended by the Actor. During the interview, Walter supplied Esurance with a copy of his cellular phone log, which indicated that he (Walters) called 911 at 4:13 pm, after the accident occurred.
- Walters also advised that he had made three (3) calls after the accident and prior to calling 911; the first call being at 4:02 pm. Walters's phone log suggests the accident occurred shortly before 4:02 pm.
- Esurance requested and received the Pennsylvania State police Crash Report. In the report, Trooper Edwin Machacek indicated the Pennsylvania State Police received the call for the accident at 4:17 pm.
- 11. Esurance denied the claim, as the Actor's policy was not in force at the time of the accident.
- D. On January 2, 2019, your Affiant conducted an interview with Ryne Rutkowski, Quality Assurance Coordinator, Erie County Department of Public Safety, who provided the following information:
 - 1. Your Affiant requested a Computer Aided Dispatch Incident Detail report for the motor vehicle accident on October 3, 2018.
 - 2. Rutkowski supplied your Affiant with Erie County 911 CAD Incident report #2018-00129267.
 - 3. Upon review of the report, it was found that Robert Walter called 911 at 16:14:02 hrs. to report a three car motor vehicle accident with no injuries. The location was reported to be at I-79 southbound at I-90.
 - 4. The call was transferred to Pennsylvania State Police, Girard Station, at 16:15:55 hrs.
- E. On January 7, 2019, your Affiant and Special Agent Bradley Capan conducted an interview with Corporal Christopher Wingard, Pennsylvania State Police, Girard Station, who provided the following information:
 - 1. Your Affiant advised Corporal Wingard of the investigation and he reviewed the PA Crash Report prepared by Trooper Edwin Machacek.
 - 2. Corporal Wingard indicated that the time on the accident report was incorrect. Wingard supplied your Affiant with the Trooper's report that contained the narrative.

Page	of
1 446	



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0271		
Defendant Name:	First:	Middle:	Last:		
	SABRINA	MICHELLE	YOVICH		

- 3. Upon a review of the narrative, which was not available to Esurance, the report stated that Trooper Machacek first interviewed the operator of Unit #2, Shane Coon, at 4:30 pm.
- 4. Corporal Wingard also reviewed the State Police dispatch record that indicated that the PSP Girard Station received the call for the accident from the 911 Center at 4:17 pm.
- 5. The dispatch record also indicated that Trooper Machacek called for a tow truck at 4:35 pm.
- 6. Trooper Machacek also cited the Actor for a PA Vehicle Code violation, Following too Closely.
- 7. Corporal Wingard supplied your Affiant with a copy of Crash Report # PA 2018-1143851.
- F. On January 7, 2019, your Affiant and Special Agent Bradley Capan conducted an interview with Rick Sornberger, owner of Rick Sornberger Automotive, who provided the following information:
 - 1. Sornberger did recall the accident and he did tow the Actor's vehicle.
 - 2. Sornberger stated, in his opinion the insurance company would total the Actor's vehicle. Sornberger indicated the vehicle had heavy front-end damage and most of the air bags were deployed.
 - Sornberger stated that the Actor's vehicle sat at his garage for some time and then he found out the Actor did not have insurance. At that point, Sornberger towed it to the Actor's place of employment.
- G. On January 7, 2019, your Affiant and Special Agent Bradley Capan conducted an interview with Robert Walter, who provided the following information:
 - Walter was advised of the investigation and stated that he was involved in the accident caused by the Actor on October 3, 2018 on Interstate 79.
 - 2. Walter stated that he was stopped in the travel lane for construction and the Actor drove her vehicle into the rear of his vehicle.
 - 3. Walter stated that after the accident, he exited his vehicle and found the Actor was sitting in her vehicle, talking on her cellular phone.
 - 4. Walter stated that a short time later, the Actor exited her vehicle and told him that she did not have an insurance card, but supplied him with her Esurance policy number that she had written down on a piece of paper.
 - 5. Walter indicated at some point after the accident, he realized that no one had called 911, at which time he called for police response.
 - 6. Walter stated that on October 3, 2018 at around 7:00 pm he filed a claim with Esurance for the damage caused by the accident.
 - 7. Walter stated that on October 4, 2018, he received a call back from Esurance, who advised him that there were concerns as to the validity of the Actor's insurance policy.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number		
First:		Middle:	Last:		
Defendant Name:	SABRINA	MICHELLE	YOVICH		

- 8. Walter was asked to submit his cellular phone records, which he did. The records indicated that he (Walter) called the Erie County 911 Center at 4:13 pm.
- 9. Your Affiant showed Walter the phone records supplied by Esurance and Walter confirmed that they are the records that he submitted to Esurance.
- 10. Walter stated several days later he was advised by Esurance the Actor's policy was not valid at the time of the accident.
- 11. Walter did file a claim with his insurance company and was required to pay a \$500.00 deductible.
- 12. His vehicle was totaled and his insurance company, State Farm Insurance, paid him \$3,600.00 for his 2005 Jeep Liberty.
- H. On January 7, 2019, your Affiant and Special Agent Bradley Capan conducted an interview with the Actor, Sabrina Yovich, who provided the following information:
 - 1. Your Affiant advised the Actor of the investigation and the Actor agreed to answer questions concerning the vehicle accident and the Esurance claim that was filed.
 - 2. The Actor admitted that she did not have valid insurance at the time of the accident.
 - 3. The Actor agreed that she previously had an insurance policy with Progressive Insurance which was terminated in September of 2018.
 - 4. The Actor stated that she was traveling south on Interstate 79 and did not see the vehicles stopped in front of her. She collided into the rear of one vehicle and then into the rear of a second vehicle.
 - 5. The Actor stated that after the vehicles came to rest, she realized that she did not have automobile insurance and called Esurance. She purchased a policy at the scene of the accident and then supplied the policy number to the other drivers and the PA State Police Trooper.
 - 6. The Actor admitted that she told Esurance that the accident occurred at 4:30 pm, after she purchased the auto insurance policy, in an attempt to have Esurance pay for the damages to her vehicle and the other vehicles involved in the accident.
 - 7. The Actor stated that her vehicle sustained between \$3,000.00 and \$4,000.00 damage.
- I. On January 8, 2019, your Affiant conducted an interview with Shane Coon, who provided the following information:
 - 1. Coon stated that he was involved in the accident on October 3, 2018 on Interstate 79. Coon stated that he was stopped for construction in the travel lane when he was rear-ended by the Actor. Coon was pushed into the center median and the Actor's vehicle continued on and struck the vehicle that had been in front of him.
 - 2. Coon stated that he was operating a vehicle owned by his company, Computer Support & Associates Inc. Coon stated that the company's vehicle was totaled as a result of the accident by their insurance carrier, Penn National Insurance Company.

POLICE	CRIMINAL	COMPL	AINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0271		
	First:	Middle:	Last:		
Defendant Name:	SABRINA	MICHELLE	YOVICH		

3. Computer Support & Associates Inc., confirmed the vehicle was totaled and they were responsible for a \$500.00 deductible.

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor Sabrina Michelle Yovich.

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

Magisterial District Judge

My commission expires first Monday of January,

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: WASHINGTON COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 27-2-01 VS. MDJ: Hon, David W. Mark (NAME and ADDRESS): Address: 68 East Pike Street, Suite 205 SANDRA BURD First Name Last Name Gen Canonsburg, PA 15317 1102 Walnut Street, Follansbee, WV 26037 Telephone: (724)745-5754 NCIC Extradition Code Type ☑ 1-Felony Full ☐ C-Misdemeanor Surrounding States ☐ 5-Felony Pending Extradition ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number OTN/LiveScan Number Date Filed Complaint/Incident Number Request Lab Services? ☐ YES 🖾 NO MAR /2 8 2019 IF20180278 **GENDER** ров 07/11/1960 Co-Defendant(s) POB Add'l DOB Middle Name ☐ Male First Name Last Name Gen. AKA RACE White ■ Asian Black Native American Unknown Unknown **ETHNICITY** ☐ Hispanic Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) ☐ PLE (Purple) BRO (Brown) Hair ☐ BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) ☐ BLU (Blue) BLK (Black) BRO (Brown) GRN (Green) GRY (Gray) Eye Color HAZ (Hazel) ☐ MAR (Maroon) PNK (Pink) XXX (Unknown) DNA □ YES ⊠ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** 150 **Defendant Fingerprinted** ☐ YES ☐ NO Ft. HEIGHT In. Fingerprint Classification: 6 **DEFENDANT VEHICLE INFORMATION** State Registration Haz Comm'l Veh. School Veh. Oth. NCIC Veh. Code Reg. mat Ind. same as Plate # Sticker (MM/YY) П Def. VIN 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). SDAG JEROME ORIE (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SUPERVISORY SPECIAL AGENT ROBERT M. GIFT BCI-139 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box)

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

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

with violating the penal laws of the Commonwealth of Pennsylvania at [302]

(County Code)

[63]

therefore designated as John Doe or Jane Doe

in WASHINGTON County

Washington, Pa

Route 844 (Jefferson Ave)

(Place-Political Subdivision)

(Subdivision Code)

on or about OCTOBER 23, 2018 AND DATES THEREAFTER

			鄉	POLI	CE CR	IMINAL (COMPLAINT
Pocket Number: Date	Filed: 2/8 2019 U. G	OTNILiveScan	Yumber	i.		/Incident Nu	
Defendant Name: First: SANDI		Middle:		Last: BURD		·	
The acts committed by the acci When there is more than one o (Set forth a <i>brief</i> summary of the facts without more, is not sufficient. In a sur The age of the victim at the time of the be listed. If the identity of an account r	ffense, each offens sufficient to advise the nmary case, you must o offense may be include	se should be num defendant of the nat cite the specific section ad if known. In addition	bered chror ure of the offen on(s) and subs on, social secu	nologicall se(s) charg ection(s) or rity number	y. ged. A citatio f the statute(rs and financ	n to the statute s) or ordinance	e(s) allegedly violated, e(s) allegedly violated.
Inchoate	☐ Solicitation 18 902 A	☐ Conspiracy 18 903		Num	ber of Victir	ns Age 60 or C	Older
☑ 1 4117	(A)(2) of ti	ne 18	1	F3			
Lead? Offense Section	Subsection .	PA Statute (1	itle) Coun	ts Gr	ade NC	C Offense Code	UCR/NIBRS Code
PennD@T Data (if applicable) Accident N	lumber		☐ Intersta	te	☐ Safe	ty Zone	☐ Work Zone
Statute Description (include the	name of statute o	r ordinance): INS	URANCE FRA	UD			
any fact or thing material to the insura her insurance coverage, when in fact, Inchoate			ng the vehicle I	to her insur	ance covera		e added the verificie to
□ 2 3922	(A)(1) o	f the 18		F3	3 4 1 4 -		t t t
Lead? Offense# Section PennDOT Data Accid	Subsection	PA Statute	(Title) Co	unts (Grade N	CIC Offense Cod	ie UCR/NIBRS Code
(if applicable) Numb	oer		Inter			ifety Zone	Work Zone
Statute Description (include the	e name of statute o	r ordinance): cri	MINAL ATTEN	1PT / THE	FT BY DEC	EPTION	
Acts of the accused associated with this Offense: On or about October 23, 2018 and various dates thereafter, the Actor did, with the intent to commit the crime of Theft By Deception, any act that constituted a substantial step towards the commission of that crime, namely, in an attempt to obtain in excess of \$5,000.00 from GEICO Insurance, the Actor stated that her vehicle was involved in an accident at a time after she added the vehicle to her insurance coverage, when in fact, the accident occurred prior to the Actor adding the vehicle to her insurance coverage.							
Inchoate Attempt	Solicitation	Conspiracy	Ni	umber of V	ictims Age	60 or Older _	**
Offense 18 901 A	18 902 A	18 903		12 · · · · ·			
Lead? Offense# Section	Subsection	f the PA Statute	(Title) Co	unts (Grade N	CIC Offense Cod	de UCR/NIBRS Code
PennDOT Data Accid	Company of the Compan	FA Statute	(ntte) Co ☐ Inter			efety Zone	Work Zone

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

Acts of the accused associated with this Offense:

			製 POL	CE CRIMINAL COMPLAINT
Docket Number:	MAR F2189:2019	OTN/LiveScan Number		Complaint/Incident Number IF20180278
	First:	Middle:	Last:	

Døcket Number:	MATR F21821:2019	OTN/LiveScan Numb	er	Complaint/Incident Number IF20180278
	First:	Middle:	Last:	
Defendant Name:	SANDRA		BURD	

- 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.
- 13. 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 3.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

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.)

MAR 28 2019

AND NOW, on this date

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

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

(Madisterial District Court Number)

Docket Number:	PMARI 28 2019 ULG	TN/LiveScan Number	Complaint/Incident Number IF20180278	
	First:	Middle:	Last:	
Defendant Name:	SANDRA		BURD	

AFFIDAVIT of PROBABLE CAUSE

Date of Application:

Date of Violations:

October 23, 2018 and dates thereafter

Criminal Complaint No.:

Name of Affiants:

Supervisory Special Agent Robert M. Gift

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Your Affiant, Robert Gift, who is employed as a Supervisory Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since March 2000, is the case agent assigned to the investigation involving the Actor, Sandra Burd.
- B. The investigation of the Actor was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral from Ross Lockhart, Special Investigator with GEICO Insurance. Lockhart alleged that the Actor reinstated her canceled automobile policy on the date of loss. The Actor was involved in a single vehicle accident with her car (2014 Kia Optima) and two (2) deer. The Actor then advised during the insurance claim that her vehicle was damaged in the accident after she reinstated the auto coverage. The Actor advised that she made the policy reinstatement prior to the accident, when in fact, the Actor was in the single vehicle accident prior to the automobile policy reinstatement. The amount of attempted theft is over \$5,000.00.
- C. Your Affiant reviewed the claim file provided by Lockhart and found the following information:
 - 1. On October 22, 2018, at approximately 8:11 PM, the Actor reinstated her GEICO Insurance auto policy which had canceled on October 19, 2018. The Actor reinstated the policy coverage for her 2014 Kia Optima.
 - 2. On October 23, 2018, the Actor reported that she was involved in a single vehicle accident with two (2) deer at approximately 6:30 AM after reinstating her auto policy.
 - 3. The Actor was asked if she took any photos of the damage to the vehicle. The Actor advised that she took photos of the damage immediately after the accident occurred.
 - 4. GEICO was able to determine through the metadata that the photos were taken on October 22, 2018 at approximately 7:11 PM which is prior to the Actor reinstating her auto policy.
 - 5. The total amount of damages to the Actor's vehicle was over \$5,000.00. GEICO Insurance denied the claim and no payments were made.
- D. Your Affiant, along with Special Agent Bill McKee, interviewed the Actor at the Meadows Casino located in Washington, PA. The Actor provided the following information:
 - 1. According to the Actor, she lives paycheck to paycheck and is constantly late on all of her bills. The Actor advised that when she is paid she will usually sit in her car and make the payments if able.
 - 2. The Actor said that on the night of the accident (October 22, 2018) she was aware that her GEICO Insurance policy had lapsed for nonpayment but she "thought she was in her thirty (30) day grace period".



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Docket Number:	Date Filed:	QTN/LiyeScan Number	Complaint/Incident Number
1(JL:140-19	- A A TO 9 2019	U64 7842 0	IF20180278
	HARK ZO CUIS	Middle:	Last:
Defendant Name:	SANDRA		BURD

- 3. The Actor stated she was involved in a single vehicle accident with her car (2014 Kia Optima) and two (2) deer on Route 844 (Jefferson Avenue) in Washington, PA. The Actor stated that the accident was right near GG & C Bus Company. Your Affiant determined that the GG & C Bus Company address is 2924 Jefferson Avenue, Washington, PA.
- 4. The Actor advised when the accident occurred she did not have valid insurance coverage at the time. The Actor then called GEICO from the scene of the accident and paid the GEICO auto policy at that time.
- 5. The Actor said she immediately took photos of the damage and then called her daughter's boyfriend (Brendon) to come and pick her up.
- 6. The Actor said that Brendon ended up driving her car back to her home address of 1102 Walnut Street, Follansbee, WV 26037 and she drove Brendon's car.
- 7. The Actor said the next morning (October 23, 2018) she called in a claim with GEICO and advised that she was in an accident with two (2) deer that morning around 6:30 AM. The Actor admitted to your Affiant that this information she provided to GEICO was false because she was afraid to tell the truth.
- 8. The Actor stated that GEICO came to her home and performed an appraisal of the damage to her vehicle. The damage was approximately \$5,102.76.
- 9. Your Affiant then asked the Actor about the recorded statement that she gave to GEICO where she stated the accident happened the next morning after obtaining the insurance coverage. The Actor stated she had already lied so she was "sticking with it".
- 10. The Actor once again informed your Affiant that "she thought she was in her thirty (30) day grace period". The Actor then went on to inform your Affiant that she has had brain/head injuries and has "metal in her head". The Actor advised that she understood what was going on and was not under the influence of drugs or alcohol at this time.

Based upon the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the issuance of an arrest warrant for the Actor, Sandra Burd.

Docket Number:	() (/) ~ (AMAD, Q Q 2010		Complaint/Incident Number IF20180278
	First:	Middle:	Last:
Defendant Name:	SANDRA		BURD

I, SUPERVISORY SPECIAL AGENT ROBERT M. GIFT, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

	Rebut on at
	(Signature of Affiant)
Sworn to me and subscribed before me this day of	MAR 28 2019
Date	, Magisterial District Judge
My commission expires first Monday of January,	soon of Washing

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: WASHINGTON COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 27-2-01 VS. MDJ: Hon. David W. Mark (NAME and ADDRESS): Address: 68 East Pike Street, Suite 205 **SWEENEY** STEFAN Middle Name Last Name Canonsburg, PA 15317 First Name 690 Buena Vista Street, Washington, PA. 15301 Telephone: (724)745-5754 NCIC Extradition Code Type 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition □ B-Misdemeanor Limited 2019 DEFENDANT IDENTIFICATION INFORMATION Docket Number OTN/LiveScan Number Complaint/Incident Number Request Lab Services? ☐ YES ☐ NO LOY IF-2018-0127 **GENDER** Co-Defendant(s) ров 04/24/1988 POB Add'l DOB Male First Name Middle Name Last Name Gen. ☐ Female **AKA** RACE ☐ White ☐ Hispanic ☐ Asian Native American Unknown **ETHNICITY** Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) **DNA Location** DNA ☐ YES ☐ NO WEIGHT (lbs.) FBI Number **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** ☐ NO ☐ YES Fingerprint Classification: 5 6 DEFENDANT VEHICLE INFORMATION State Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. Haz Ind. same as mat Plate # Sticker (MM/YY) П Def. VIN 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). SDAG JEROME ORIE (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SPECIAL AGENT JASON CHIMILE 540 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box)

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

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

with violating the penal laws of the Commonwealth of Pennsylvania at [204]

(County Code)

[63]

therefore designated as John Doe or Jane Doe

Washington, Pa. 15301

in WASHINGTON County

690 Buena Vista Street,
(Place-Political Subdivision)

(Subdivision Code)

on or about April 2, 2018 and dates thereafter

Docket	Number 3-3		Date F	iled: \$ 2019	W	2005	N/LiveScan Nu ├	umber Complaint/Incident Number IF-2018-0127				er		
Defenda	ant Nai	ne:	First:	first: Middle: ' Last: STEFAN SWEE					ENEY					
The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a <i>brief</i> summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)														
Inchoat Offens		18 901 A		☐ Solici 18 902			onspiracy 1903			Numb	er of	Victims Age 60 o	or Olde	r
	1	4117		(a)(2	·)	of the	18 PA C.S.		1	F3				
Lead?	Offense #	36	ction	Subse	ection		PA Statute (Title)	Counts	Grad	de	NCIC Offense Code	Ļ	ICR/NIBRS Code
(if a	nDOT [pplical	ole) /	Accident Nu	47 6 1			nance): INSUR		terstate			Safety Zone		☐ Work Zone
On or about Insurance incomplet accident of	Acts of the accused associated with this Offense: On or about April 2, 2018 and dates thereafter, the Actor, did knowingly and with the intent to defraud an insurer or self-insured, namely, Progressive Insurance, present or cause to be presented to Progressive Insurance any statement forming a part of or in support of any insurance claim, that contained false, incomplete, or misleading information concerning any fact or thing material to the insurance claim, namely, the Actor told Progressive Insurance that an accident causing damage to his vehicle occurred on or about April 2, 2018, after obtaining insurance, when in fact, the damage occurred prior to the Actor obtaining insurance coverage.													
Offens	444	⊠ Attemp 18 901 /		∐ Solid 18 90			onspiracy 3 903		Mullipe		-411113	Age 60 or Older		
	2	3922		(a)		of the	18 PA C.S.		1	F3				
and the second second	Offen: InDOT applica	Data	Section Accider Numbe	ıt 🛁	osection		PA Statute (Titl		Counts Interstate	Gr	ade [NCIC Offense of Safety Zone	Loge	UCR/NIBRS Code Work Zone
			lude the r	name o	f statute	e or ordin	nance): CRIMI I	NAL A	TTEMPT ,	/ THEF	T BY	DECEPTION		
Acts of the accused associated with this Offense: On or about April 2, 2018 and dates thereafter, the Actor intentionally did, with the intent to commit the crime of Theft by Deception, any act that constituted a substantial step toward the commission of that crime, namely, in an attempt to obtain in excess of \$2,000.00 from Progressive Insurance, the Actor told Progressive Insurance that an accident causing damage to his vehicle occurred on or about April 2, 2018, after obtaining insurance, when in fact, the damage occurred prior to the Actor obtaining insurance coverage.														
Inchos Offens		18 901 A		☐ Solic 18 90			onspiracy 3 903		Numbe	er of Vio	tims	Age 60 or Older		
Lead?	3 Offens	4117	Section	(b)	(4) section	of the	18 PA C.S.		1	M1		NGIC Offeren	2-4-	LIONAUDDO O-d-
Pen	nDOT applica	Data	Acciden Numbe	t			PA Statute (Title		Counts Interstate	G	ade [NCIC Offense C Safety Zone	Sode	UCR/NIBRS Code Work Zone
Statute Description (include the name of statute or ordinance): INSURANCE FRAUD Acts of the accused associated with this Offense: On or about April 2, 2018 and dates thereafter, the Actor, knowingly and with the Intent to defraud an insurer, namely Progressive Insurance, filed an application for automobile insurance containing any false information, or concealed for the purpose of misleading information concerning any fact material thereto, namely, the Actor indicated that he was not involved in any accidents within the last five years of filling out the application with Progressive Insurance,														
wieli (i i i	when in fact, he was involved in an accident within the last five years of filling out the application with Progressive Insurance.													

			PO PO	LICE CRIMINAL	COMPLAIN
ket Number:	Pate Filed:	1 1/ 0° OTN/Live	Scan Number	Complaint/Incident N	umber

Docket Number:	AAR 2 1/2019 UU92	FN/LiveScan Number	Complaint/Incident Number IF-2018-0127
Defendant Name:	First: STEFAN		ast: WEENEY

- 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 3.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

MAR 21 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)

AND NOW, on this date



Docket Number: C Date Filed 2019 OTN/LiveScan Number IF-2018-0127

Defendant Name: First: Middle: Last: STEFAN SWEENEY

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

April 2, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Jason Chimile

Law Enforcement Agency: Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 1251 Waterfront Place Mezzanine Level

Pittsburgh, PA 15222

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since October 2015, is the case agent assigned to the investigation involving the Actor, Stefan Sweeney.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Brandt Salnick of Progressive Insurance. The investigation revealed that that the Actor called Progressive Insurance to obtain a liability only insurance policy on his 2006 Lincoln truck on April 2, 2018 at 6:55 A.M. The Actor finalized the Progressive Insurance application at 7:15 A.M.

On April 2, 2018 at 12:30 P.M., the Actor reported a claim to Progressive Insurance that his vehicle was struck by an unknown vehicle while it was parked at his work site. During the Actor's recorded phone conversation with Progressive Insurance, the Actor stated that he believed that his vehicle was pushed into a second parked vehicle owned by his boss, James Petty.

During the Actor's recorded conversation on April 4, 2018 with Megan Carrier from Progressive Insurance, the Actor stated that his work shift is from 6:00 A.M. to 6:00 P.M., and he usually checks his vehicle periodically because of the accidents that happen on the work site. The Actor stated that he discovered the damage to both vehicles at approximately 9:30 A.M. during one of his checks.

In several follow-up statements with Progressive Insurance, the Actor maintained that he noticed the damage to his vehicle when he went out to check on it at 9:30 A.M.

Progressive Insurance contacted James Petty. Petty advised that the Actor struck his parked vehicle around 7:00 A.M. and that he met the Actor in the parking area of the work site where the accident occurred. In addition, Petty had taken photos of the damages to the vehicle. The photos that Petty provided to Progressive Insurance indicate that they were taken on April 2, 2018 at 7:04 A.M. and 7:06 A.M.

C. Your Affiant reviewed the claim filed with Progressive Insurance and found the following:



Pocket Number:	Date Filed: MAR 2/1 2019 U GC	TN/LiveScan Number) 口うる	Complaint/Incident Number IF-2018-0127
	First:	Middle:	Last:
Defendant Name:	STEFAN		SWEENEY

- 1. The investigation revealed that the Actor purchased a Progressive Insurance liability coverage policy on April 2, 2018 at 7:15 A.M. During the Actor's recorded phone conversation on April 2, 2018 to obtain his Progressive Insurance policy, the Actor stated that his home address was 690 Buena Vista Street, Washington, PA. 15301. The Actor stated that he had not been involved in any accidents in the past 5 years.
- 2. On April 2, 2018 at 12:30 P.M., the Actor contacted Progressive Insurance and reported that his 2006 Lincoln Mark LT was struck (by a large work truck) while parked at a work site. The Actor stated that his vehicle was pushed into a second parked vehicle (red Dodge Charger) owned by James Petty. The Actor indicated his work shift was from 6:00 A.M. to 6:00 P.M. The Actor reported that the incident occurred sometime around 9:30 A.M., when he was exiting the work site for the day.
- 3. Progressive Insurance contacted the owner of the Dodge Charger, James Petty. Petty stated that the Actor struck his parked vehicle sometime prior to 7:00 A.M. Petty advised that he had taken photos of both vehicles at the scene of the accident. Petty submitted the photos to Progressive Insurance.
- 4. The metadata on the photos that Petty provided to Progressive Insurance show they were taken on April 2, 2018 at 7:04 and 7:06 A.M., which was prior to the Actor incepting his Progressive Insurance policy.
- 5. The photograph taken of the damages to Petty's vehicle showed extensive front end damage. The attempted amount of theft is in excess of \$2,000.00.
- D. On Monday, August 27, 2018, your Affiant, along with Special Agent William McKee, interviewed James Petty at his residence. Petty provided the following information:
 - 1. Petty was asked to describe the damage that was caused to his vehicle on April 2, 2018.
 - 2. Petty stated the he was at a gas and oil worksite in Bridgeport, Ohio when the damage to his vehicle occurred.
 - 3. Petty stated that his vehicle, along with other employee vehicles, were parked along a hillside at the worksite in Bridgeport.
 - 4. Petty advised that an employee came up to him at the worksite at approximately 7:00 A.M. and notified him of an accident involving his vehicle.
 - 5. Petty advised that he immediately went down to where the vehicles were parked and observed that a black Lincoln Mark LT driven by the Actor had backed into the front of his vehicle causing extensive damage to the front end of his vehicle.



Docket Number:	Date Filed: 0	TN/LiveScan Number	Complaint/Incident Number
	First:	Middle:	
Defendant Name:	STEFAN		SWEENEY

- 6. Petty stated that when he parked his vehicle at the beginning of his shift he made sure that there was about ten feet between his vehicle and the vehicle parked behind him. Petty stated that when he came down to see the accident there was about 2 feet left between his vehicle and the vehicle parked behind him, indicating that his vehicle had been pushed a few feet backward by the Actor's vehicle.
- 7. Petty advised that he told the Actor that he needed the name of his insurance company and his insurance information.
- 8. Petty stated that the Actor said that he had insurance and he observed the Actor walk directly to his vehicle and make a call on his cell phone.
- 9. Petty advised that he never received any insurance information off of the Actor. The Actor filled out an accident report at the work site and that is where Petty obtained the information for the Actor's insurance.
- 10. Petty was asked if there were any large work trucks at the work site that day. Petty advised that there were no large work trucks there that day. He stated that there were only employee vehicles at the worksite that day.
- 11. Petty was asked if he had any photos of the accident or the damaged vehicles from the accident on April 2, 2018.
- 12. Petty provided your Affiant with a photo that he had taken as soon as he saw the damage to his vehicle. The photo indicated a date and time of April 2, 2018 at 7:03 A.M. Petty advised that the photograph was an accurate depiction of what his vehicle damage looked like at the time the photograph was taken.

Based upon the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the issuance of an arrest warrant for the Actor, Stefan Sweeney.

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

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

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

			200ke	* FUL	TOT CIVIIANIANT COMETANA
Docket Number:	Date Filed: MAR 2/1 2019	Uloq	TN/LiveScan Number		Complaint/Incident Number IF-2018-0127
Defendant Name:	First: STEFAN		Middle:	Last:	EENEY
MAR 21 2019 _{Da}	ite	^	The -		, Magisterial District Judge
My commission expir	es first Monday of	January,	1020		sugalth of Pa

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: ALLEGHENHY COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 5-2-36 VS. (NAME and ADDRESS): MDJ: Hon. James Hanley Jr. Address: 4371 Murray Avenue TARAN BECKETT Middle Name First Name Last Name Gen Pittsburgh, Pennsylvania 15216 76 Wagner Drive, McDonald, Pennsylvaina 15057 Telephone: (412)521-7782 NCIC Extradition Code Type 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition ☐ 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Docket Number Date Filed Complaint/Incident Number OTN/LiveScan Number ☐ YES ☐ NO <u>~3\z~\</u>0 <u>07 VPW 20</u> C. IF-2018-0110 Co-Defendant(s) GENDER ров 05/12/1994 Add'l DOB Middle Name Gen. Male First Name Last Name ☐ Female AKA RACE Black Unknown ✓ White ☐ Asian Native American **ETHNICITY** ☐ Hispanic Non-Hispanic Unknown BLU (Blue) PLE (Purple) BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) Hair GRN (Green) PNK (Pink) BLK (Black) ONG (Orange) WHI (White) XXX (Unk./Bald) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number **MNU Number** 135 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO Fingerprint Classification: 8 DEFENDANT VEHICLE INFORMATION Oth. NCIC Veh. Code Comm'l Veh. School Veh. State Haz Registration Reg. Ind. same as mat Plate # Sticker (MM/YY) Def. Model Color VIÑ Year Make Style Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507). SDAG KARA L. COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) SPECIAL AGENT RICHARD GRANDE (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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

in ALLEGHENHY County

Pennsylvania

therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [483]

(County Code)

r021

76 Wagner Drive, Mcdonald,

(Place-Political Subdivision)

(Subdivision Code)

on or about FEBRUARY 22, 2018 AND DATES THEREAFTER



						P	OLI				MPLAINT
Docket Number:	Date File	d:	ОТІ	V/LiveSca	n Numbe	r	Complaint/Incident Number IF-2018-0110			er	
Defendant Name:	First: TARAN			Middle:		Last: BECKETT					
The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a <i>brief</i> summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)											
Inchoate	ţ	Solicitation 18 902 A		nspiracy 903			Num	ber of V	/ictims Age 60 or	Older	
⊠ 1 4117	((a)(2)	of the	18 PA C.	S.	1	F3				
Lead? Offense \$	ection	Subsection		PA Statute	(Title)	Counts	Gra	ade	NCIC Offense Code	U	CR/NIBRS Code
PennDOT Data (if applicable)	Accident Numb	987			□ Ir	nterstate			Safety Zone		☐ Work Zone
Statute Description (in	clude the na	me of statute	or ordin	nance): IN	SURANC	E FRAUD					
caused to be presented to The General Insurance any statement forming a part of or in support of any insurance claim, that contained false, incomplete, or misleading information concerning any fact or thing material to the claim, namely, the Actor stated that his vehicle was involved in an accident at a time after he obtained insurance coverage, when in fact, the accident occurred prior to the Actor obtaining insurance coverage. Inchoate Attempt Solicitation Conspiracy Number of Victims Age 60 or Older											
Offense 18 901		18 902 A		903			F3				
☐ 2 392 Lead? Offense#	Section	(a)(1) Subsection	of the	18 PA C		1 Counts		Grade	NCIC Offense Co	ode	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number					Interstate		Е] Safety Zone		☐ Work Zone
Statute Description (in		me of statute	or ordin	ance): c R	IMINAL A	ATTEMPT ,	/ THE	FT BY D	ECEPTION		
Acts of the accused associated with this Offense: On or about February 22, 2018 and dates thereafter, the Actor did with the intent to commit the crime of Theft by Deception, any act that constitutes a substantial step towards the commission of the crime, namely in an attempt to obtain in excess of \$2,000.00 from The General Insurance, the Actor stated that his vehicle was involved in an accident at a time after he obtained insurance coverage, when in fact, the accident occurred prior to the Actor obtaining insurance coverage.											
Inchoate ☐ Attem Offense 18 901		Solicitation 18 902 A		onspiracy 903		Numbe	er of V	ictims A	Age 60 or Older		
			of the		77711 3	<u></u>	پل		NOIG D#		LION MINDO O-1-
Lead? Offense# PennDOT Data (if applicable)	Section Accident Number	Subsection		PA Statut		Counts Interstate		irade	NCIC Offense Co Safety Zone		UCR/NIBRS Code Work Zone
		ne of statute	or ordin	ance):							
Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:											

Docket Number:	Date Filed:	OTN/LiveSc	an Number	Complaint/Incident Number
	1 1			IF-2018-0110
	First:	Middle:	La	ast:
Defendant Name: TARAN			В	ECKETT

- 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 <u>1</u> through <u>3</u>.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

(Date)

(Signature of Affiant)

AND NOW, on this date March 19 209 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)

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number	
	/ /		IF-2018-0110	
	First:	Middle:	Last:	
Defendant Name:	TARAN		BECKETT	

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

February 22, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent Richard Grande

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 1251 Waterfront Place

Pittsburgh, PA

- A. Your Affiant, Richard Grande, is a Special Agent with the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office. Your Affiant has a combined twenty seven (27) years of experience in law enforcement as a Police Officer/Detective and Special Agent and is the case agent assigned to this investigation involving the Actor, Taran Beckett.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Jeff Gervasi of The General Insurance Special Investigations Unit. It is alleged that the Actor was involved in an automobile accident and then obtained insurance coverage after the accident occurred. The Actor then provided false information to The General Insurance as to the time of the accident. The amount of the attempted theft was in excess of \$2,000.00.
- C. Your Affiant reviewed the claim referral provided by The General Insurance and found the following:
 - 1. On February 14, 2018, Christi Lagard, the Actor's mother, renewed her The General insurance policy # PN3296895, but removed the Actor and his vehicle from the policy. Her policy, with the changes, was renewed effective February 19, 2018.
 - 2. The Actor contacted The General Insurance online and purchased an automobile policy, #PN3847205, on February 22, 2018 at 8:12 a.m. The Actor was involved in an accident on February 22, 2018 while traveling on McKee Road in Oakdale, PA. The Actor rear-ended another vehicle driven by Ali Reid, who was stopped for backed up traffic. The impact caused rear-end damage to Reid's vehicle.
 - 3. The Actor exchanged information with Reid at the accident scene. The Actor gave her his The General Insurance card with policy #PN3296895. The Actor left the scene shortly after the information exchange as his vehicle was drivable. Reid had her vehicle towed from the scene because it was not drivable.
 - 4. On February 22, 2018 at 10:15 a.m., the Actor re-contacted The General Insurance and filed a claim. The Actor stated that he was involved in an accident on that date causing damage to another vehicle. The Actor stated that he rear-ended a vehicle while on his way to work while traveling on McKee Road in Oakdale, PA. The Actor stated that the accident occurred around 9:00 a.m.
 - 5. On March 5, 2018, The General Insurance Claims Adjuster, Edward Blake, contacted the Actor as part of the claims process. During a recorded call he went over the events of the accident with the Actor. The Actor stated that he rear-ended another vehicle that was stopped in front of him while traveling on McKee Road.
 - 6. The Actor told Blake that after the impact he exchanged information with the other driver, Ali Reid, giving her his The General Insurance card. The Actor said that neither he nor Reid were injured as a result of the accident, and after exchanging information he left the scene as his truck was drivable.



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	First:	Middle:	Last:
Defendant Name:	TARAN		BECKETT

- 7. Blake advised the Actor that their records indicated that he purchased his policy on the same day as the accident. Blake asked the Actor if he purchased his policy before or after the accident. The Actor stated "before". Blake then advised the Actor that the claim would be submitted for further investigation due to a possible coverage issue with his policy.
- D. Your Affiant, along with Special Agent William McKee, conducted an interview with Ali Reid. Reid provided the following information.
- 1. Reid stated that she remembered the accident on February 22, 2018. She said it happened on McKee Road while she was on her way to work around 07:45 a.m.
- Reid stated that traffic slowed in front of her and came to a stop. The next thing she remembered was being struck
 from behind by another vehicle. Reid said that after the impact she pulled off the road as did the other vehicle,
 which was a large pickup truck. She also said that her vehicle sustained severe rear end damage as a result of the
 impact.
- 3. Reid stated that after the impact she exchanged information with the Actor who was driving the truck. The Actor gave Reid his The General Insurance policy number PN3296895. She said that after the accident, the Actor left the scene. Reid's car was disabled from the impact so she called AAA to have it towed.
- 4. Reid said that once she got to work, she called Erie Insurance, her insurance carrier, and filed a claim and provided them with the Actor's insurance information. She then discovered that The General Insurance policy that the Actor gave her had expired.
- 5. The damage to Reid's vehicle totaled \$4,018.55 and she paid an \$800.00 deductible.
- E. Your Affiant served a search warrant on AAA Towing requesting tow record information for member Ali Reid.
- 1. Their tow records showed that Ali Reid requested a tow for her vehicle on February 22, 2018 at 8:07 a.m.
- F. Your Affiant, along with Special Agent Amy Adams, conducted an interview with the Actor. He provided the following information.
 - 1. The Actor stated that the accident occurred on February 22, 2018 while he was traveling on McKee Road. He did not see traffic that had backed up in front of him and was unable to stop in time. The Actor said that he struck a vehicle stopped in front of him from behind.
 - He said that he pulled over after the impact as did the car he hit. The Actor stated that he exchanged information
 with the girl that was driving the other vehicle. The Actor said that he gave her his The General Insurance card.
 The Actor stated that after the information exchange his truck was drivable, so he left the scene.
 - 3. The Actor stated that he contacted The General after the accident because he discovered that his policy had expired. The Actor also said that he gave Ali the old expired insurance card at the accident scene. The Actor stated he told The General that the accident happened around 08:30 a.m.
 - 4. Your Affiant explained that the information found in this investigation showed that the accident occurred around 07:45 a.m., prior to him obtaining the insurance coverage. The Actor stated that he purchased the new policy after the accident in an attempt to get the damage(s) from the earlier accident covered.

Based on the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Taran Beckett.

	POLICE	CRIMINAL	COMPLAINT
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
			IF-2018-0110
	First:	Middle:	Last:
Defendant Name:	TARAN		BECKETT

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

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

		ml
	(Signa	ature of Affiant)
Sworn to me and subscribed before me this day of	MARCH	2=19
3/29/19Date Juniford		al District Judge
My commission expires first Monday of January, My Commission expires first Monday of January, MAGISTERIAL DISTRIBUTION MY COMMISSION MY COMMISSION	RICTIUDGE RICTO5236 RICTO5	SEAL
SKEL WONDERS		

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: LAWRENCE COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 53-1-01 VS. MDJ: Hon. MELISSA AMODIE (NAME and ADDRESS): Address: 430 COURT STREET TONYA Μ. PROWELL Middle Name First Name Last Name NEW CASTLE, PA 16101 103 1/2 EAST SHARP STREET, NEW CASTLE, PA 16102 Telephone: (724)652-8555 **NCIC Extradition Code Type** ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number **Date Filed** OTN/LiveScan Number Complaint/Incident Number Request Lab Services? 7R-63-19 ☐ YES ☐ NO 2/19/19 1)(079782-10 IF2018-0170 GENDER ров 05/15/1984 Add'l DOB Co-Defendant(s) POB ☐ Male First Name Middle Name Last Name Gen. AKA RACE ☑ White 🗌 Asian Black Native American Unknown **ETHNICITY** Non-Hispanic Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair GRN (Green) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye ☐ HAZ (Hazel) Color MAR (Maroon) ☐ PNK (Pink) XXX (Unknown) DNA ☐ YES ⊠ NO **DNA Location** WEIGHT (lbs.) **FBI Number MNU Number Defendant Fingerprinted** ☐ YES ☐ NO Ft, HEIGHT In. Fingerprint Classification: 2 DEFENDANT VEHICLE INFORMATION State Registration Comm'l Veh. School Veh. Oth. NCIC Veh. Code Haz Reg. Ind. Plate # mat same as Sticker (MM/YY) Def. VIN Make Model Year 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). SDAG KARA COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) WILLIAM MCKEE (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box)

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

(Subdivision Code)

on or about JUNE 23, 2018 AND DATES THEREAFTER

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

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[43]

therefore designated as John Doe or Jane Doe

in LAWRENCE County

Castle, Pa 16102

103 1/2 E. Sharp Street, New (Place-Political Subdivision)

									POL		CRIMINAL		LAINT
Docket Nu	umber: 03-/	9	Date Filed / /	:	ОТ	N/LiveSca	n Num			IF20	plaint/incident i 18-0170	Number	<u> </u>
Defendan	t Name:		irst: ONYA			Middle: M.		1	Last PRC	: DWELL			<u>G</u>
When the (Set forth a without more The age of t	The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PiNs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)												
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Lead? Of	fense #	Section	n Si	ubsection		PA Statute	(Title)	Counts	G	Grade	NCIC Offense Code	UCR/NIBI	RS Code
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	licable)		Number - e the name	of statute	or ordin	ance): c R							IN ZONE
Acts of the accused associated with this Offense: On or about June 23, 2018 and dates thereafter, the Actor did, with the intent to commit the crime of Theft by Deception, any act that constituted a substantial step toward the commission of that crime, namely, in an attempt to obtain between \$200.00 and \$2,000.00 from Safe Auto Insurance, the Actor stated that she was involved in an accident while operating her vehicle after she reinstated her Safe Auto policy, when in fact, the Actor was involved in the accident prior to reinstating the policy.													
Inchoate Offense	☐ Att	empt 901 A		olicitation 902 A		nspiracy 903		Numbe	er of \	/ictims /	Age 60 or Older		P P P P P P P P P P P P P P P P P P P
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Docket Number: OR-103-19	Date Filed: /	OTN/LiveScan Num	ber	Complaint/Incident IF2018-0170	Number
Defendant Name:	First: TONYA	Middle:	Last: PRO	WELL	22
2. I ask that a warra made.	nt of arrest or a summ	ons be issued and that the	e defendant be	required to answer t	he charges I have
belief. This verific		nplaint are true and correc to the penalties of Sectior			
4. This complaint co	nsists of the preceding	g page(s) numbered $\underline{1}$ thro	ough <u>3</u> .		
	<i>lvania</i> that require filin	provisions of the Case Re g confidential information			
of Pennsylvania and	were contrary to the A	ted and hereafter, were ag Act(s) of the Assembly, or d, an affidavit of probab	in violation of th	e statutes cited.	
				Win min	
	•	Date)		(Signature of	Affiant)
AND NOW, on this dat	· FCB 19	OF Cortify the	at the complaint h	as been properly com	pleted and verified.
An affidavit of probable	cause must be complete	ed before a warrant can be is	ssued.		
(Magisterial District Co	7 - 7) urt Number)	(Issuing Authority)	<u> </u>		EAL.

Docket Number: CK-103-19	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Nu IF2018-0170	mber _
Defendant Name:	First: TONYA	1111-1111	ast: PROWELL	<u> </u>
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AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

June 23, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent William McKee

Law Enforcement Agency: Insurance Fraud Section Western Regional Office 1251 Waterfront Place Pittsburgh, PA Pennsylvania Office of Attorney General

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since February 2006, is the case agent assigned to the investigation involving the Actor, Tonya M. Prowell.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Jeff Shallabarger of Safe Auto Insurance. The investigation revealed that the Actor was involved in an automobile accident on June 22, 2018. At the time of the accident, the Actor's Safe Auto policy was lapsed for non-payment and her vehicle was not insured. After the accident on June 22, 2018, the Actor made a payment and reinstated her Safe Auto policy. On June 25, 2018, the Actor reported to Safe Auto that she was involved in the accident on June 23, 2018 at 5:00 PM, in an effort, to have Safe Auto pay for the damages to the vehicle she hit on June 22, 2018. The amount of the attempted theft is less than \$2,000.00.
- C. Your Affiant reviewed the claim filed with Safe Auto Insurance and found the following:
 - 1. The Actor's Safe Auto insurance policy cancelled on May 30, 2018 due to non-payment.
 - 2. The Actor was involved in an automobile accident while operating her 2015 Chrysler 200 on June 22, 2018 around 7:00-7:30 PM when the Actor backed into a parked Toyota SUV owned by Bernice Guarnieri.
 - 3. On June 22, 2018, at 8:29 PM, the Actor made a payment to Safe Auto and reinstated her policy.
 - 4. On June 25, 2018, at 5:56 PM, the Actor reported to Safe Auto that she had backed into Guarnieri's Toyota SUV on June 23, 2018 at 5:00 PM.

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Docket Number:

Date Filed:

OTN/LiveScan Number

IF2018-0170

Defendant Name:

Date Filed:

OTN/LiveScan Number

IF2018-0170

Middle:

Defendant Name:

Defendant Name:

Defendant Name:

Date Filed:

OTN/LiveScan Number

IF2018-0170

Defendant Name:

Defendant

5. On June 26, 2018, at 11:32 AM, the Actor provided a recorded statement to Safe Auto Adjuster Scott Studer. During her statement the Actor stated that while backing out of her driveway on June 23, 2015, at 5:00 PM, she hit Guarnieri's parked vehicle. The Actor stated that her driver side taillight hit Guarnieri's vehicle.

- 6. On June 26, 2018, at 5:45 PM Bernice Guarnieri provided a recorded statement to Dana Davis of Safe Auto. Guarnieri stated that on June 22, 2018 at approximately 7:00 PM/7:30 PM that she noticed that her vehicle had been hit resulting in damages to the bumper. Neighborhood kids playing in the area informed her that the Actor backed into her car and left the scene. Guarnieri contacted the New Castle Police to report the incident. The police made contact with the Actor later that evening approximately 10:30 PM, and had them exchange information. No formal police report was completed.
- D. Your Affiant interviewed Bernice Guarnieri who provided the following information:
 - 1. On Friday June 22, 2018, Guarnieri was visiting her elderly father who lives at 1503 Hanna Street in New Castle. Guarnieri parked her Toyota SUV in front of his garage behind his house which is on Sharp Street. The vehicle was parked across the street from the Actor's residence.
 - 2. Around 7:30 PM Guarnieri walked out to her vehicle and noticed that it had been hit and that there was glass/plastic fragments on the ground. Guarnieri asked some kids who were playing in the area and they informed her that the Actor hit her vehicle while pulling out of her driveway. The Actor left the area without leaving a note or informing her of the accident.
 - 3. Guarnieri telephoned the New Castle Police to report that her vehicle had been hit. Guarnieri said that it was a "hit and run". Guarnieri said that Officer Josh Covert arrived at the scene and viewed the damage. The Actor did not arrive back at the location while Officer Covert was there. Officer Covert eventually spoke with the Actor about the accident later that evening. The Actor acknowledged to Officer Covert that she hit Guarnieri's vehicle.
 - 4. The Actor contacted Guarnieri the following day. The Actor informed Guarnieri that she had insurance coverage with Safe Auto and texted Guarnieri the policy information.
 - 5. On June 25, 2018 Guarnieri filed a claim with Safe Auto. During the claim process Safe Auto informed Guarnieri that the claim was under investigation because the Actor said

Page _ of _

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Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number		,
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First: Middle: Last: **Defendant Name: PROWELL TONYA** Μ.

> that the accident occurred on June 23, 2018 (Saturday). Guarnieri confirmed with-safe Auto that the accident occurred on June 22, 2018 (Friday). Guarnieri provided a screen shot of the day, date, and time of when she telephoned the New Castle Police about the accident. The screen shot reflected that Guarnieri telephoned the police on June 22, 2018 at 7:53 PM.

- 6. On June 28, 2018, Guarnieri received a letter from Safe Auto indicating they were not paying her claim because the Actor did not have coverage at the time of the accident. Guarnieri filed a claim with her insurance carrier, State Farm, who paid for the damages to her vehicle.
- 7. The total amount paid to repair Guarnieri's vehicle was \$809.84. She paid a \$250.00 deductible and State Farm sent her a check for \$559.84.
- E. Your Affiant, along with Special Agent Dave Dalcamo, interviewed the Actor at her residence and she provided the following information:
 - 1. The Actor was not certain of the dates, but when your Affiant said that she backed into Bernice Guarnieri's vehicle on June 22, 2018 at around 5:00 PM, she acknowledged that that sounded about right. The Actor said that she was backing out of her driveway and did not see the vehicle parked across the street from her house.
 - 2. The Actor acknowledged that her Safe Auto policy had lapsed because of non-payment sometime prior to the accident. She said that she is a single mother and she had a choice to put food on the table for her three children or pay her insurance bill, so she did not pay her insurance. The Actor said she pays her insurance when she can afford to.
 - 3. The Actor said that she did not have insurance coverage when she backed into Guarnieri's vehicle. After the accident the Actor telephoned Safe Auto to make a payment and reinstate her policy.
 - 4. The Actor acknowledged that she falsely reported that the accident occurred after reinstating her policy in an effort to have Guarnieri's damages covered.

POLICE CRIMINAL COMPLAIN

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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident I IF2018-0170	Number
	First:	Middle:	Last:	(
Defendant Name:	TONYA	М,	PROWELL	$\overline{\mathcal{D}}$
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Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Tonya M. Prowell.

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

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

Sworn to me and subscribed before me this 19 day of 2000 day of 20

COMMONWEALTH OF PENNSYLVANIA COUNTY OF BUTLER

Magisterial District Number: 50-3-04

MDJ: Hon. David T. Kovach Address: 9028 Marshall Road

Cranberry Township, PA 16066

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA VS.

(NAME and ADDRESS):

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Plate # Make Model Style Color Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. SI 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 Office (Place-Political Subdivision) In 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 Office Of Attorney Idea (Place-Political Subdivision) In BUTLER County [10] on or about AUGUST 14, 2018 AND DATES THEREAFTER			State	Haz	R		VENICE			Scho	ol Veh. 🔲	Oth. NCIC	Veh. Code	Reg.
Office of the attorney for the Commonwealth	Plate #			I .		=	/		i					1
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 filling. See Pa.R.Crim.P. 507). SDAG KARA COTTER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) 1. SUPERVISORY SPECIAL AGENT ROBERT M. GIFT BCI-139 (Name of the Affiant) (PSP/MPOETC - Assigned Affiant ID Number & Badge # Office Agency Ordinary State: (check appropriate box) 1. Magnetic Agency Ordinary State: (check appropriate box) 1. Laccuse the above named defendant who lives at the address set forth above Placcuse the defendant whose name is unknown to me but who is described as Placcuse 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 [212] Freedom Road, Cranberry Twp. (Place-Political Subdivision) In BUTLER County [10] On or about AUGUST 14, 2018 AND DATES THEREAFTER	V/IN						<u>' ' </u>	Mode	 		Style		Color	ጘ <u> </u>
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(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Department or Agency Represented and Political Subdivision) (Department or Agency Represented and Political Subdivision) (Department or Agency ORI Number) (Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) (Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) (Police Agency ORI Number) (Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) (Police Agency ORI Number	filing. See Pa.R.0	Crim.P. 507	7).											. 24.
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The acts committed by When there is more that (Set forth a brief summary of without more, is not sufficient the age of the victim at the the listed. If the identity of an	n one offens the facts suffici nt. In a summary ime of the offens	e, each offe ent to advise t case, you mu se may be incl	ense sho the defend st cite the uded if kn	ould be nu lant of the n specific se own. In add	imbered ature of to ction(s) a ition, soc	i chronolo he offense(s nd subsection ial security r	ogically s) charge on(s) of numbers	/, ed. A cit the stat s and fin	ation to the statu ute(s) or ordinand ancial informatio	te(s) alfo ce(s) alfo	agedly violated, agedly violated.	
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Offense		ubsection	*******	PA Statute	(Title)	Counts	Gra	de	NCIC Offense Code	UCF	R/NIBRS Code	
PennDOT Data (if applicable)	Accident Number	-				Interstate		□s	afety Zone	[Work Zone	
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Lead? Offense#	Section	Subsection	<u> </u>	PA Statu	le (Title)	Counts		rade	NCIC Offense Co	ode	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number					☐ Interstate			Safety Zone	[Work Zone	
Statute Description (inc		e of statute	or ordi	nance): cı	RIMINA	. АТТЕМРТ	/ THEF	T BY D	ECEPTION			
Acts of the accused ass On or about August 14, 2018 substantial step towards the that his vehicle was involved Actor adding the vehicle to his	and various dat commission of th In an accident al	es thereafter, nat crime, nam t a time after l	the Actor	attempt to	obtain in	excess of \$4	1,000.00) from Pi	rogressive Insura	nce, the	Actor stated	
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			of the						*	"		

PA Statute (Title)

Counts

☐ Interstate

Grade

· Page ___ of __

. UCR/NIBRS Code

· ☐ Work Zone

NCIC Offense Code

☐ Safety Zone

Lead? Offense# Section Subsection PA Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

		The state of the s	POLICE CRIMINAL COMPLAIN						
Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF20180213						
	. //								
	First:	Middle:	Last:						
Defendant Name:	TYLER	L	COLLINS						

- 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 3.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth

(Before a warrant of arrest can be issued, an affidavit of probable cause necessition issuing authority, and attached.)	nust be complet	•	
. (Date)		gnature of Affiant) \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
AND NOW, on this date 2/21/2019 Certify that the comp	laint has been prop	erly completed	and verified.
An affidavit of probable cause must be completed before a warrant can be issued.	•		•
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NOW	POLICE	CRIMINAL	COMPL	AINT.
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Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF20180213
Defendant Name:	First:	Middle:	Last:
Delenuarit Name:	TYLER	1	COLLINS

AFFIDAVIT of PROBABLE CAUSE

Date of Application:

Date of Violations:

August 14, 2018 and dates thereafter

Criminal Complaint No.:

Name of Affiants:

Supervisory Special Agent Robert M. Gift

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Your Affiant, Robert Gift, who is employed as a Supervisory Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since March 2000, is the case agent assigned to the investigation involving the Actor, Tyler Collins.
- B. The investigation of the Actor was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral from Larry Meta, Special Investigator with Progressive Insurance. Meta alleged that the Actor made a policy change on the date of loss. The Actor removed his 2004 Pontiac Grand Am and added his 2015 Kia Optima. The Actor then advised during the insurance claim that his vehicle (2015 Kia Optima) was damaged in an accident when he rear-ended another vehicle. The Actor advised that he made the policy change prior to the accident, when in fact, the Actor was in the accident prior to the automobile policy change. A police crash report revealed that the accident occurred prior to the policy inception. The amount of attempted theft is over \$4,000.00.
- C. Your Affiant reviewed the claim file provided by Meta and found the following information:
 - 1. On August 14, 2018 at approximately 6:48 AM, the Actor made a policy change with Progressive Insurance. The Actor removed his 2004 Pontiac Grand Am and replaced it with his 2015 Kia Optima.
 - 2. On August 14, 2018, the claimant, Erin Huff, reported a claim with her insurance company, Nationwide Insurance, stating that she was rear-ended by the Actor on August 14, 2018 at approximately 6:30 AM.
 - 3. The Cranberry Twp. PD responded to the scene and took a crash report. The date and time on the crash report were August 14, 2018 at approximately 6:28 AM.
 - 4. Progressive Insurance claim notes and recorded call on August 15, 2018 reveal that the Actor advised them that the accident occurred after he made the policy change with Progressive Insurance.
 - 5. The total amount of damages to the Actor's and claimant's vehicles was over \$2,000.00. Progressive Insurance denied the claim and no payments were made.
- D. Your Affiant, along with Special Agent Jason Chimile, interviewed Joshua Shimko. Shimko is a Cranberry Twp. Police Officer and responded to the accident scene. Shimko provided the following information:
 - 1. Shimko responded to the scene of the accident on August 14, 2018 at approximately 6:29 AM. Shimko verified this through the crash report that he had prepared. Your Affiant obtained a copy of the crash report.
 - 2. Shimko advised that the accident was a non-reportable accident between the Actor and Erin Huff. Shimko stated that the Actor was the at-fault driver.



Docket Number:	Date Filed:	OTN/LiveSc	an Number	Complaint	Incident Num	ber	
	l			IF201802	13	* * * * * * * * * * * * * * * * * * * *	•
	First:	Middle:	Las	it:			
Defendant Name:	TYLER .	L	CO	LLINS			

- Shimko said that when he arrived on scene Huff was present but the Actor had already left the area. Huff informed Shimko that the Actor provided her with an expired insurance card and she was not sure he had valid insurance.
- 4. Shimko was able to track down the Actor at a local Cranberry Twp. residence of 804 Berkley Manor Drive, Cranberry, PA 16066. When Shimko asked the Actor if his insurance was valid the Actor showed him a valid insurance policy on his cell phone.
- E. Your Affiant, along with Special Agent William McKee, interviewed Erin Huff. Huff provided the following information:
 - 1. According to Huff, she was involved in an accident on August 14, 2018 at approximately 6:30 AM. Huff advised that she was stopped for traffic when she was rear-ended by a vehicle being driven by the Actor.
 - 2. Huff advised that at the time of the accident she did not believe she was injured but called 911 in order to have an officer respond. Huff also believed that she could drive her vehicle at the time of the accident.
 - 3. Huff stated that before the officer responded she and the Actor exchanged insurance information but she noticed that Collins provided her with an expired insurance card. When Huff questioned the Actor as to the expiration date he said the policy was expired and asked for her to "wait until later" before she submitted a claim.
 - 4. Huff then took pictures of the damaged vehicles and the Actor's expired insurance card.
 - 5. Huff informed the Actor that she would not "wait until later" and that she had already called the police. The Actor told Huff that he did not have time to wait and he left the scene before the officer arrived.
 - 6. Huff advised that it was not until later that day that she was informed by her insurance company, Nationwide Insurance, that the Actor's insurance was not valid at the time of the accident. Huff proceeded with a claim through Nationwide Insurance and paid the \$500.00 deductible for the approximately \$4,000.00 in damage to her vehicle.
- F. Your Affiant, along with Special Agent William McKee, interviewed the Actor at a McDonald's restaurant located in Cranberry Twp., PA. The Actor provided the following information:
 - 1. According to the Actor, he was in an accident on August 14, 2018 in which he was the at-fault driver. The Actor admitted that at the time of the accident there was no insurance coverage on his vehicle (2015 Kia Optima).
 - 2. The Actor stated that the Cranberry Twp. Police responded to the scene of the accident and took a crash report.
 - 3. The Actor said that from the accident scene he called Progressive Insurance and removed his 2004 Grand Am and obtained insurance coverage for the 2015 Kia Optima.
 - 4. The Actor once again admitted that the information he provided to Progressive Insurance in support of the claim was false/fraudulent in regards to the time of the accident.

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	POLICE	CRIMINAL	COMDI	A INI"
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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF20180213
Defendant Name:	First:	Middle;	Last:
	TYLER	L	COLLINS

Based upon the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the issuance of an arrest warrant for the Actor, Tyler Collins.

I, SUPERVISORY SPECIAL AGENT ROBERT M. GIFT, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

			Felou	: M 1	Pl
			(Sig	nature of Affiant)	
Sworn to me and subscribed before me this	21	day of	FEBRUAR	· \$/	2019
50-3-04 Date Dail T.	Morac	1		7 erial District Ju	dge
My commission expires first Monday of January,	2012				
				SEAL	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: INDIANA COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 40-2-01 VS. MDJ: Hon. Guy B. Haberl (NAME and ADDRESS): Address: 829 Water Street VICTOR ROBERT VELEZ First Name Middle Name Indiana, PA 15701 Last Name Gen 260 Green Valley Road, Indiana, PA 15701 Telephone: (724)463-8781 NCIC Extradition Code Type ☐ 1-Felony Full 5-Felony Pending Extradition C-Misdemeanor Surrounding States Distance: 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number **Date Filed** OTN/LiveScan Number Complaint/Incident Number Request Lab Services? CR-118-1 03/25/201 ☐ YES 🛛 NO IF20180261 U 691294-2 **GENDER** ров 11/08/1980 POB Co-Defendant(s) Add'I DOB ☑ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE White ■ Asian Black Native American Unknown **ETHNICITY** ☐ Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair XXX (Unk./Bald) BLK (Black) ONG (Orange) ☐ WHI (White) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) DNA **DNA Location** ☐ YES ⊠ NO WEIGHT (lbs.) FBI Number **MNU Number** 280 **Defendant Fingerprinted** ☐ YES Ft. HEIGHT In. Fingerprint Classification: 2 6 DEFENDANT VEHICLE INFORMATION State Registration Haz Comm'i Veh. School Veh. Oth. NCIC Veh. Code Reg. mat Ind. Plate # same as Sticker (MM/YY) П 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). SDAG DENNIS KISTLER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) BCI-139 Taking inj I. SUPERVISORY SPECIAL AGENT ROBERT M. GIFT (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above ☐ I accuse the defendant whose name is unknown to me but who is described as ☐ 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 [408] 351 Chestnut Street, Indiana, Pa

in INDIANA County

[32]

(County Code)

15701

on or about SEPTEMBER 28, 2018 AND DATES THEREAFTER

Docket Number: CR-118-19	Date Filed: 03/2/5//2019	OTN/LiveScan No U 691294-2	ımber	Complaint/Incident IF20180261	Number
Defendant Name:	First: VICTOR	Middle: ROBERT	La: VE		
When there is more that (Set forth a brief summary of without more, is not sufficient The age of the victim at the time.	n one offense, each the facts sufficient to adv t. In a summary case, you me of the offense may be	cribed below with each A offense should be numberise the defendant of the nature in must cite the specific section included if known. In addition, hed, list only the last four digital	ered chronologic of the offense(s) c (s) and subsection(s social security nun	cally, harged. A citation to the stat s) of the statute(s) or ordina obers and financial informat	tute(s) allegedly violated,
Inchoate	Solicitation 18 902 A	☐ Conspiracy 18 903	N	umber of Victims Age 60 c	or Older
☑ 1 4117	(A)(2)	of the 18	1 - F.		
#	ction Subsection	PA Statute (Title) Counts	Grade NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	ccident Number	_	☐ Interstate	☐ Safety Zone	☐ Work Zone
	ude the name of sta	tute or ordinance): INSUR	ANCE FRAUD		
Metromile Insurance any state any fact or thing material to the and collision coverage to his in insurance coverage.	ement forming a part of on the insurance claim, name insurance coverage, when	the Actor did knowingly and wir in support of any insurance of y, the Actor stated that his veh in fact, the accident occurred p	aim that contained in icle was involved in	false, incomplete, or mislead an accident at a time after l	ling information concerning ne added comprehensive
Inchoate		Conspiracy 18 903	Number o	f Victims Age 60 or Older	
☐ 2 3922 Lead? Offense# S	(A)(1)	of the 18	the state of the property of the property of the state of	M1	
PennDOT Data (if applicable)	Accident Subsection Number ———	PA Statute (Title	Interstate	Grade NCIC Offense C	ode UCR/NIBRS Code Work Zone
Statute Description (incli	ude the name of stat	ute or ordinance): crɪmɪr	NAL ATTEMPT / TI	HEFT BY DECEPTION	
constituted a substantial step t stated that his vehicle was invo	18 and various dates ther lowards the commission on olved in an accident at a t	nse: eafter, the Actor did, with the i f that crime, namely, in an atte ime after he added comprehen we and collision coverage to his	mpt to obtain in exe sive and collision co	cess of \$200.00 from Metror verage to his insurance cove	nile Insurance, the Actor
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of	Victims Age 60 or Older	
		of the		Benediction of the second of t	
Lead? Offense# \$ PennDOT Data (if applicable)	ection Subsection Accident Number	PA Statute (Title	Counts Interstate	Grade NCIC Offense Co	ode UCR/NIBRS Code Work Zone
Statute Description (inclu	1 / 10,000 Va 10	ute or ordinance):			-
Acts of the accused asso	ociated with this Offe	nca'			
	oldiod with the One				



Docket Number: CR-118-19	Date Filed: 03/25/2019	TN/LiveScan Number 294 – 2		Complaint/Incident Number IF20180261
	First:	 Middle:	Last	•
Defendant Name:	VICTOR	ROBERT	VEL	EZ

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

(Date)

AND NOW, on this date MARCH 25, 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.

40-2-01

(Magisterial District Court Number)

(Issuing Authority)

AFFIDAVIT of PROBABLE CAUSE

Date of Application:

Date of Violations:

September 28, 2018 and dates thereafter

Criminal Complaint No.:

Name of Affiants:

Supervisory Special Agent Robert M. Gift

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Your Affiant, Robert Gift, who is employed as a Supervisory Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since March 2000, is the case agent assigned to the investigation involving the Actor, Victor Velez.
- B. The investigation of the Actor was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral from Sam Massey, Special Investigator with Metromile Insurance. Massey alleged that the Actor was involved in an accident on September 26, 2018 in which he only had liability coverage on his automobile (1998 Chevrolet Monte Carlo). The Actor then waited and added comprehensive and collision coverage to his automobile policy on September 28, 2018. The Actor then waited until October 22, 2018 to submit a claim stating that he was involved in a single vehicle accident on September 29, 2018. The Actor advised during the insurance claim that his vehicle was damaged in the accident after he added the comprehensive and collision to his auto coverage. The Actor advised that he made the policy change prior to the accident, when in fact, the Actor was in the single vehicle accident prior to the automobile policy change. The amount of attempted theft is over \$1,000.00.
- C. Your Affiant reviewed the claim file provided by Massey and found the following information:
 - 1. On September 28, 2018, at approximately 10:36 AM, the Actor added comprehensive and collision coverage to his Metromile Insurance auto policy. The Actor added the policy coverage for his 1998 Chevrolet Monte Carlo.
 - 2. On October 22, 2018, the Actor reported that he was involved in a single vehicle accident on September 29, 2018 in which he wrecked his vehicle into his garage wall after adding the additional coverage to his auto policy.
 - 3. Metromile Insurance was able to locate a tow company / receipt which revealed the vehicle was towed on September 26, 2018, not September 29, 2018 as the Actor had advised.
 - 4. The total amount of damages to the Actor's vehicle was over \$1,000.00. Metromile Insurance denied the claim and no payments were made.
- D. Your Affiant interviewed Anthony Churner at his place of business, Don Huey Auto and Truck Service located in Indiana, PA. Churner provided the following information:
 - 1. According to Churner, his company towed a 1998 Chevy Monte Carlo, red in color, on September 26, 2018.
 - 2. The vehicle was towed from 351 Chestnut Street, Indiana, PA to Mark's Auto Service located in Indiana, PA for the Actor.
 - 3. Churner was able to provide your Affiant with a copy of the tow bill.



Docket Number: CR-118-19	Date Filed: 03/25/4019 U	OTN/LiveScan Number 691294-2	Complaint/Incident Number IF20180261
	First:	Middle:	Last:
 Explained at the contract of the	VICTOR	ROBERT	VELEZ

- E. Your Affiant interviewed Mark Romaine at his place of business, Mark's Auto Service and Repair located in Indiana, PA. Romaine provided the following information:
 - 1. According to Romaine, his friend, the Actor, was in an accident with his vehicle (1998 Chevrolet Monte Carlo) "sometime this past fall or winter". Romaine could not give an exact date because the Actor's vehicle was towed to his place of business when he was not there.
 - 2. Romaine advised that he did not even know the vehicle was there for a few days until the Actor informed him the vehicle was parked in the rear lot. Romaine stated that the vehicle is currently still at his location because he has not gotten the "go ahead" by the Actor to fix the vehicle.
 - 3. Romaine has allowed the Actor to store the vehicle at his location because they are friends and he (Romaine) will eventually fix the vehicle.
- F. Your Affiant interviewed Charles Spadafora. Spadafora provided the following information:
 - 1. Spadafora was the Actor's landlord at the 351 Chestnut Street, Indiana, PA location. Spadafora advised that he had rented the location to the Actor. The Actor no longer rents the location.
 - 2. Spadafora stated that near the end of October 2018 he was driving by the 351 Chestnut Street location and noticed that there was damage to the garage / wall area.
 - 3. Spadafora spoke with the Actor concerning the damage. The Actor informed Spadafora that the damage / accident occurred on September 26, 2018 when he wrecked his 1998 Chevy Monte Carlo into the wall. Spadafora stated that he was upset that the Actor waited a month to tell him about the damage.
 - 4. Spadafora advised that the Actor's insurance company, Metromile Insurance, did cover the cost of the damage, approximately \$3,100.00, to fix the garage / wall.

Based upon the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the issuance of an arrest warrant for the Actor, Victor Velez.

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR- <u>118-19</u>	03/25/2019	U 6 9 1294-2	IF20180261
	First:	Middle:	Last:
Defendant Name:	VICTOR	ROBERT	VELEZ

I, SUPERVISORY SPECIAL AGENT ROBERT M. GIFT, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

(Signature of Affiant)

Sworn to me and subscribed before me this

5TH day of

MARCH, 2019

03/25/2019Date

, Magisterial District Judge

My commission expires first Monday of January, 2024

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: CRAWFORD COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 30-2-01 VS. MDJ: Hon. Samuel Pendolino (NAME and ADDRESS): LYNN NEAL VICTORIA Address: 894 Diamond Park First Name Middle Name Last Name Meadville, PA 16335 6714 Highway 6, Linesville, PA 16424 Telephone: (814)724-2736 NCIC Extradition Code Type □ 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ E-Misdemeanor Pending Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Docket Number Date Filed OTN/LiveScan Number Complaint/Incident Number ☐ YES ☐ NO /27/2019 IF-2019-0006 U 692641-5 CR-106-19Co-Defendant(s) ров Ра GENDER ров 01/27/1971 Add'l DOB Last Name Gen. Middle Name ☐ Male First Name AKA RACE White Black Native American Unknown Asian Hispanic ETHNICITY ☐ Non-Hispanic Unknown BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair PNK (Pink) BLK (Black) ONG (Orange) XXX (Unk./Bald) GRN (Green) Color ■ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color X HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) ☐ MUL (Multicolored) **DNA Location** WEIGHT (lbs.) DNA ☐ YES 🖾 NO FBI Number **MNU Number** 185 156657TB4 Ft. HEIGHT In. ☐ YES ⊠ NO **Defendant Fingerprinted** Fingerprint Classification: 2 **DEFENDANT VEHICLE INFORMATION** Oth, NCIC Veh. Code Comm'l Veh. School Veh. Reg. State Haz Registration Ind. \square same as Plate # mat Sticker (MM/YY) 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). SDAG KARA COTTER (Signature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) SPECIAL AGENT DAVID A. DALCAMO 457 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above

☐ I accuse the defendant whose name is unknown to me but who is described as

with violating the penal laws of the Commonwealth of Pennsylvania at [301]

(County Code)

[20]

therefore designated as John Doe or Jane Doe

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

AOPC 412A - Rev. 7/18

in CRAWFORD County

16335

908 Park Avenue, Meadville, Pa

(Place-Political Subdivision)

Subdivision Code)

on or about FEBRUARY 5, 2018 AND DATES THEREAFTER

Docket Number	· 19 3 /		OTN/LiveScan N 69264/-5 Middle: LYNN		Gomplaint/In IF-2019-00 Last: NEAL	cident Number
When there is (Set forth a brief s without more, is no The age of the vici	more than one out the facts of the facts of sufficient. In a suiting at the time of the	offense, each offe s sufficient to advise t immary case, you mus e offense may be incli	ense should be numle he defendant of the natu st cite the specific sectio	pered chronologies of the offense(s) and subsection, social security	gically.) charged. A citation to on(s) of the statute(s) on numbers and financial	edly violated, if appropriate. o the statute(s) allegedly violated, or ordinance(s) allegedly violated. information (e.g. PINs) should not
	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	•	Number of Victims	Age 60 or Older
$oxed{1}$	4117	(a)(2) o	idite 18 PA C.S.	=1	F-3	Charles 2013 a Careagon
Lead? Offense #	Section	Subsection	PA Statute (Tit	tle) Counts	Grade NCIC O	HURWIRKS LODE
PennDOT Da (if applicabl	- LACCIDANI	Number		☐ Interstate	☐ Safety Z	one
		e name of statute	or ordinance): INSU	RANCE FRAUD		
On or about Febru Bankers Insurance any insurance clair submitted docume	ery 5, 2018 and var Company, presente n that contained fal nts alleging medical	ed or caused to be pre se, incomplete, or mis I treatment on her dis	the Actor did knowingly sented to American Bank sleading information conc	kers Insurance Con erning any fact or purported to be v	npany any statement f thing material to the ir	r or self-insured, namely, American forming a part of or in support of nsurance claim, namely, the Actor ed by Dr. Joseph Joseph, when in
Inchoate [Attempt 18 901 A	Solicitation 18 902 A	Conspiracy 18 903	Numbe	er of Victims Age 60 o	or Older
Lead? Offense	3922 # Section	(a)(1) Subsection	of the 18 PA C.S.	itle) Counts	F=3	Offense Code UCR/NIBRS Code
PennDOT E (if applicat	ata Accid	ent 🖫		☐ Interstate	☐ Safety	Zone
	Transfer of the control of the Contr	22/20/20/20/20/20 E	or ordinance): THEF	T BY DECEPTION		
On or about Februa	ary 5, 2018 and date ankers Insurance C	ompany, by creating a	or intentionally obtained o	ly, the Actor subm	itted claims on a disabi	excess of \$2,000.00, which were ility medical policy alleging
Inchoate [Offense	Attempt 18 901 A	Solicitation 18 902 A	Conspiracy	Numbe	er of Victims Age 60 o	or Older
Lead? Offense	4101 Section	(a)(3) Subsection	or the 18 PA C.S. PA Statute (T	1 Counts	M-1 NCIC (Offense Code UCR/NIBRS Code
PennD@T E (if applicab	ata Accid	ent		☐ Interstate	☐ Safety	Zone
	military and propagation of the property of th	CSENSONERCOS	or ordinance): FORG	ERY		
On or about Februa	ry 5, 2018 and vari ly, the Actor submit	ted documents from I	the Actor, with the know	ledge that she had to American Banke	l no privilege to do so, rs Insurance Company	utterd a writing which she knew in order to support the Actor's

Docket Number: CR-106-19	Date Filed:	469	TN/LiveScan Number		Compla IF-201	int/Incident I 9-0006	Number		
20 AD SEC. 10	First:		Middle:	L	ast:				
Defendant Name:	VICTORIA		LYNN	l N	EAL				

- 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 3.
- 5. Lecrtify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited. (Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

AND NOW, on this date

3-27-19

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)

SEAL

Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number IF-2019-0006

Defendant Name: VICTORIA LYNN NEAL

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

February 5, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent David A. Dalcamo

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office 1251 Waterfront Place

Pittsburgh, PA

- A. Your Affiant, who has been employed as a Special Agent for the Pennsylvania Office Attorney General, Insurance Fraud Section, Western Regional Office, since February 2016, and has been a Police Officer in this Commonwealth since 1998, is the case agent assigned to the investigation involving the Actor, Victoria Lynn Neal.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Kathy Grassman of American Bankers Insurance Company of Florida. The investigation revealed that the Actor, Victoria Neal, on two occasions in 2018, submitted forged or fictitious documents stating that she was disabled and unable to work, causing American Bankers Insurance Company to make payments on the Actor's loan at Regency Finance in Meadville, Pennsylvania. The amount of the theft was approximately \$2,003.20.
- C. Your Affiant reviewed the claim filed with American Bankers Insurance Company and spoke to Kathy Grassman, Special Investigator with American Bankers Insurance Company, and found the following:
 - 1. The Actor had a disability insurance policy through American Bankers Life Insurance Company of Florida, which she had purchased with a loan at Regency Finance, in Meadville, Pa. The disability policy on the loan would cover her loan payments if she became disabled.
 - 2. On February 5, 2018, and again on November 19, 2018, the Actor submitted a disability claim, with supporting documentation, stating that she was temporarily disabled, in order to have her loan payments made by the insurance company. The claim indicated a date of loss of November 3, 2017. The amount of the claim was \$2,003.20.
 - 3. American Bankers Life Insurance Company submitted the claim documents to Dr. Joseph Joseph in Hermitage, PA for verification. Ruthann Leskowak, Dr. Joseph's Office Manager, reviewed the documents and advised that the documents were not legitimate as the doctor's signature was forged. Leskowak also advised that the dates on the documents were incorrect and the Actor was not treated on the dates listed.
- D. Your Affiant and Special Agent Amy Adams conducted an interview with Lori Williams, who provided the following information:
 - 1. Williams is employed by Regency Finance as the Office Manager.
 - 2. Williams stated that she was familiar with the insurance claim filed by the Actor.
 - 3. Williams stated that Actor submitted the claim forms to her (Williams) which she in turn submitted to American Bankers Life Insurance Company.



Docket Number: CR-106-19	Date Filed:	OTN/LiveScan Number 4 6 9 2 6 4 / - 5		Complaint/Incident Number IF-2019-0006
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Defendant Name:	VICTORIA	LYNN	NEA	<u> </u>

- E. Your Affiant received the Regency Finance records from Dwayne Jones, Compliance Manager, which provided the following:
 - 1. A review of the records showed American Bankers Assurance Company made four (4) payments on the Actor's loan.
 - 2. Seventeen (17) pages of claim forms submitted to Regency Finance by the Actor indicated that the Actor alleged two different issues that she submitted for disabilities.
 - 3. The first was an injury while she was working at Rebecca's Family Restaurant in Linesville, Pa, as the manager. The Actor indicated on the claim forms that she fell while working and injured her left knee. The Actor stated that the last day she was able to work was October 23, 2016.
 - 4. The treating physician is indicated as Ryan G. Molli DO, Meadville, Pa.
 - The second claim filed by the Actor indicated her illness as Lyme disease with the treating physician as Dr. Joseph T. Joseph. The documents indicated that the Actor was treated by Dr. Joseph on January 9, 2017, December 9, 2017 and June 8, 2018.
 - 6. The documents also indicate that the Actor was treated by Ann McCray DO for her Lyme Disease on September 24, 2018.
 - 7. American Bankers Insurance made two (2) payments on the Actor's loan at Regency Financial in reference to her Lyme disease claim on February 5, 2018 and November 19, 2018 totaling \$2003.20.
- F. Your Affiant and Special Agent William McKee conducted an interview with Dr. Joseph Joseph and Office Manager Ruthann Leskowak, who provided the following information:
 - Leskowak was advised of the investigation and did recall the Actor presenting the documents to her for the doctor's signature. Leskowak stated that the doctor did not sign the documents.
 - 2. Leskowak stated that she advised the Actor that it is the office policy that a patient has to have one year of treatment completed in the Lyme disease protocol, prior to any disability paperwork completed.
 - 3. Leskowak reviewed the documents submitted by the Actor to American Bankers Insurance Company and stated that the Actor was not seen in the office by Dr. Joseph on the dates stated.
 - 4. Dr. Joseph Joseph inspected the documents and stated that the signature on the documents was not his and that someone forged his signature.
- G. Your Affiant and Special Agent William McKee conducted an interview with Barbara Hogan, former owner of Rebecca's Restaurant, who provided the following information:
 - 1. Hogan was advised of the investigation and agreed that she was previously the owner of Rebecca's Restaurant in Linesville, but sold the restaurant.
 - 2. Hogan stated that when she was the owner, the Actor was employed as the manager.
 - 3. Hogan stated that in late 2016 the Actor advised her that she had fallen down the stairs, but indicated that she was not injured and did not seek medical treatment.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number IF-2019-0006
THE COLUMN TWO IS NOT	First:	Middle:	Last:
Defendant Name:	VICTORIA	LYNN	NEAL

- 4. Your Affiant presented Hogan with two documents that contained her name and signature, and were later submitted to American Bankers Insurance Company.
- 5. Hogan reviewed the document and stated that she did not complete the documents and the signature on the documents was not hers.
- Hogan stated sometime after the Actor allegedly fell down the steps she quit working at the restaurant. Then she
 received notice from Nationwide Insurance, the insurance company covering the restaurant, that the Actor filed a
 workers' compensation claim.
- H. Your Affiant and Special Agent Bradley Capan conducted an interview with the Actor, who provided the following information:
 - The Actor was advised of the investigation and agreed to answer questions concerning the documents submitted to American Bankers Insurance Company of Florida.
 - 2. The Actor agreed that she had a loan through Regency Finance in Meadville, PA.
 - 3. The Actor stated that she was of the impression that if at any time she became disabled she could submit documents to support her disability and the insurance company would cover the loan payments.
 - 4. Your Affiant showed the Actor the documents that were submitted to the insurance company that were allegedly signed by Barbara Hogan and Dr. Joseph Joseph.
 - 5. The Actor admitted that she forged Dr. Joseph Joseph's signature after the doctor's office would not fill out the documents.
 - 6. The Actor stated that she filled the documents out and submitted the documents to Regency Finance, who in turn submitted the documents to the insurance company.
 - 7. The Actor acknowledged that the documents signed by Barbara Hogan where also forged, but would not admit to forging the documents. The Actor only stated that she did fall and was injured when she was working for Hogan.
 - 8. The Actor stated that she filed for workers' compensation for the injury and Nationwide Insurance paid her a settlement.
 - 9. The Actor agreed that American Bankers Insurance Company made payments on her loan at Regency Finance, based on the documents that she submitted.

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Victoria Lynn Neal.

	POLICE	CRIMINAL	COMPL	ΔΙΝΙ
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Defendant Name: First: Middle: Last:	Docket Number: CR-106-19	Date Filed: 3 は71/9	OTN/LiveScan Number 4 69 26 41 - 5	Complaint/Incident Number IF-2019-0006
	Defendant Name:	First: VICTORIA		

Adver

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

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

It som	la D
(Sig	nature of Affiant)
Sworn to me and subscribed before me this 27 day of March	2019
3-27-/9 Date	erial District Judge
My commission expires first Monday of January, 2 0 2 2	
	SEAL

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **GOUNTY OF: WESTMORELAND** COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 10-2-01 VS. MDJ: Hon. ANTHONY BOMPIANI DEFENDANT: (NAME and ADDRESS): Address: 327 ARMBRUST ROAD WESLEY DALE MARTZ YOUNGWOOD, PA 15697 First Name Middle Name Last Name 109 STARBOARD VILLA #103, GREENSBURG, PA 15601 Telephone: (724)925-3888 NCIC Extradition Code Type □ 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Docket Number Date, Filed QŢŅ/LjyeSçan Number Complaint/Incident Number Request Lab Services? 12511 ☐ YES ☐ NO IE2018-0232 **GENDER** ров 11/15/1996 POB Add'I DOB Co-Defendant(s) ☑ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☑ White Asian Biack Native American Unknown ETHNICITY Hispanic Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color GRN (Green) PNK (Pink) BLN (Blonde / Strawberry) BLK (Black) Eye BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Color HAZ (Hazei) MAR (Maroon) PNK (Pink) ☐ MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☒ NO **DNA Location** WEIGHT (lbs.) **FBI Number MNU Number** Defendant Fingerprinted ☐ YES ☐ NO Ft. HEIGHT in, Fingerprint Classification: 5 8 DEFENDANT VEHICLE INFORMATION State Haz Comm'l Veh. Registration School Veh. Oth. NCIC Veh. Code Reg. Plate # mat Ind. Sticker (MM/YY) same as П VIN Def. 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). SDAG DENNIS KISTLER (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date) WILLIAM MCKEE (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. I accuse the above named defendant who lives at the address set forth above $\ \square$ 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 [302] 209 WAM 109 Starboard Villa #103,

(Subdivision Code)

on or about SEPTEMBER 10, 2018 AND DATES THEREAFTER

Greensburg, Pa 15601

County

in WESTMORELAND

[65]

(County Code)

(Place-Political Subdivision)

Description Date Filed: OTN/LiveScan Number Complaint/Incident Number IF2018-0232

Defendant Name: WESLEY DALE MARTZ

AFFIDAVIT of PROBABLE CAUSE

Date of Violation:

September 10, 2018 and dates thereafter

Criminal Complaint No:

Name of Affiant:

Special Agent William McKee

Law Enforcement Agency:

Pennsylvania Office of Attorney General

Insurance Fraud Section Western Regional Office

Pittsburgh, PA

- A. Your Affiant, who is employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, and who has been employed by the Office of Attorney General since February 2006, is the case agent assigned to the investigation involving the Actor, Wesley Dale Martz.
- B. This investigation was initiated by the Western Regional Office of the Insurance Fraud Section of the Office of Attorney General based upon a referral of information to this office by Brandt Salnick of Progressive Insurance. The investigation revealed that the Actor owned a motorcycle which was heavily damaged after being completely submerged under water due to a flood at his residence on September 10, 2018. The Actor's motorcycle was not insured at the time of the loss. On September 10, 2018, after discovering the loss, the Actor purchased a policy on the motorcycle. Later that same day the Actor filed a claim and reported that he discovered the loss of his motorcycle after he purchased the policy in order to have Progressive Insurance pay for the damages. The amount of the attempted theft was approximately \$22,175.00.
- C. Your Affiant reviewed the claim filed with Safe Auto Insurance and found the following:
 - 1. The Actor's Progressive Insurance policy on his 2017 Harley Davidson Street Glide Special motorcycle cancelled on November 3, 2017.
 - 2. On September 10, 2018 at 4:09 PM the Actor went on-line and made a payment to Progressive Insurance and his policy was reinstated at that time.
 - 3. On September 11, 2018, a claim was filed by the Actor. The Actor stated that on September 10, 2018 at 7:30 PM, after he reinstated his policy, that he discovered that his motorcycle was completely submerged under water. The Actor reported that his motorcycle was parked in his garage when his residence became flooded due to heavy rain.

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Docket Number:	3125119 4481	OTN/LiveScan Number	Complaint/Incident Number IF2018-0232
Defendant Name:	First: WESLEY	Middle: DALE	Last: MARTZ

- 4. The Actor sent a photo of his motorcycle submerged up to the headlight/bars. The metadata indicated that the photo was taken at 10:11 AM on September 10, 2018, prior to the Actor reinstating his policy.
- 5. The Actor advised that his wife had taken the photo. He said he was not aware of the damages until he arrived home from work around 7:30 PM on September 10, 2018, after he reinstated the policy earlier that day.
- 6. Progressive Insurance determined the motorcycle to be a total loss with a settlement value of \$22,175.00. Progressive Insurance did not pay the claim because the Actor's motorcycle did not have insurance coverage at the time of the loss.
- D. Your Affiant, along with Special Agent Jason Chimile, interviewed Amanda Martz and she provided the following information:
 - 1. On September 10, 2018 at around 9:30 AM Amanda discovered that the basement/garage of her townhome was flooded due to heavy rain that day. Her husband's (the Actor)) Harley Davidson motorcycle was parked in the garage.
 - 2. Amanda observed that the motorcycle was submerged under water, only the headlight area was above water. The Actor was at work and did not pick up when she tried to telephone him about the motorcycle. Amanda took a photo of the submerged motorcycle around 11:00 AM on her telephone and texted the photo to the Actor. Amanda said that the Actor responded to the text of the photo. Amanda said that the Actor did not say much, but that he was upset.
 - 3. The Actor arrived home from work at around 3:30 PM and took more photos of the damage to the motorcycle. By this time the water had receded and the motorcycle was no longer submerged.
 - 4. Amanda was not aware that the motorcycle was not insured until the Actor told her when he arrived home. Amanda said that was when the Actor began making phone calls to the insurance company.

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Docket Number: しん4910	1 2,36,19 1/7	OTN/LiveScan Number	Complaint/Incident Number IF2018-0232
Defendant Name:	First:	Middle:	Last:
	WESLEY	DALE	MARTZ

- E. Your Affiant, along with Special Agent Chimile, interviewed the Actor and he provided the following information:
 - 1. On September 10, 2018 the Actor was at work when he his wife (Amanda) texted him a photo around 11:00 AM of his Harley Davidson motorcycle submerged under water due to a flood at their residence.
 - 2. The Actor acknowledged that his insurance policy on the motorcycle had lapsed and that it was not insured when it was damaged due to the flood on September 10, 2018.
 - 3. After arriving home from work on that day at around 3:30 PM the Actor took more photos of the damage to his motorcycle. After taking the photos the Actor contacted Progressive Insurance at around 4:00 PM and reinstated his insurance policy on the motorcycle.
 - 4. The Actor said that he filed a claim for the loss of his motorcycle and falsely informed Progressive Insurance that he discovered the loss at around 5:00 PM on September 10, 2018 after he renewed the policy. The Actor acknowledged that he provided a recorded statement to Progressive Insurance and falsely stated he discovered the damage after he obtained the insurance policy, when in fact, he knew the damage occurred prior to obtaining the policy. The Actor did this in an effort to have the damages to his motorcycle covered by Progressive Insurance.

Based upon the information set forth above, your Affiant believes that there is probable cause for the issuance of an arrest warrant for the Actor, Wesley Dale Martz.

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MARTZ

I, WILLIAM MCKEE, 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,

DALE

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

,	Win Mila
	(Signature of Affiant)
Sworn to me and subscribed before me this $35^{\prime h}$ day of	February 2019
2/25/19 Date	, Magisterial District Judge
My commission expires first Monday of January,	30(40/98)
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Defendant Name:

INFORMATION AND BELIEF.

WESLEY