

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: LUZERNE



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 11-1-02
MDJ Name: Hon. THOMAS F. MALLOY SR.
Address: 100 NORTH HAZLE ST.
2ND FLOOR
Telephone: 570-825-8488

DEFENDANT: (NAME and ADDRESS):
ROBERT MATTHEW COLLINS
First Name Middle Name Last Name Gen.
3 POWELL STREET
MOUNTAIN TOP, PA 18707

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

DEFENDANT IDENTIFICATION INFORMATION
Docket Number: CR 52819 Date Filed: 06/26/19 OTN/LiveScan Number: U722109
Complaint/Incident Number: X74-0041490 Request Lab Services? YES NO

GENDER: Male Female
DOB: 07/17/1965 POB: Add'l DOB: Co-Defendant(s)
AKA First Name: Middle Name: Last Name: Gen.

RACE: White Asian Black Native American Unknown
ETHNICITY: Hispanic Non-Hispanic Unknown

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

EYE COLOR: BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray)
 HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown)
WEIGHT (lbs.): 200

DNA: YES NO DNA Location: Ft. HEIGHT In. 6 0

FBI Number: MNU Number: Defendant Fingerprinted: YES NO
Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION
Plate # State Hazmat Registration Sticker (MM/YY) Comm'l Veh. Ind. School Veh. Oth. NCIC Veh. Code Reg. same as Def.
VIN Year Make Model Style Color

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

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

(Signature of Attorney for Commonwealth)

06/26/19
(Date)

I, CPL JAMES TRAVIS
(Name of Affiant - Please Print or Type)

00424983/06680
(PSP/MP/OTEC - Assigned Affiant ID Number & Badge #)

PAPSP1A00
(Police Agency ORI Number)

of the Pennsylvania State Police, Organized Crime Task Force
(Identify Department or Agency Represented and Political Subdivision)

do hereby state: (check appropriate box)

- 1. I accuse the above named defendant who lives at the address set forth above
- I accuse the defendant whose name is unknown to me but who is described as _____
- I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe or Jane Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at: VARIOUS LOCATIONS WITHIN THE CITY OF WILKES-BARRE, LUZERNE COUNTY, PENNSYLVANIA
(Subdivision Code) (Place-Political Subdivision)

in LUZERNE County 40 on or about JUNE 1, 2006 - MAY 31, 2016
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 6/26/19	OTN/LiveScan Number	Complaint/Incident Number X74-0041490
Defendant Name	First: ROBERT	Middle: MATTHEW	Last: COLLINS

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input checked="" type="checkbox"/> Lead?	1	3121	(a)(1)	of the	Title 18 , PA Crimes Code	5	F1		02A/11D
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Rape

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did engage in sexual intercourse with four (4) female complainants, namely K.G., D.J., A.L. and H.E., by forcible compulsion, namely while THE DEFENDANT was acting in the capacity of a sworn police officer for the City of Wilkes-Barre and in exchange of or in lieu of arrest, in violation of Section 3121(a)(1) of the PA Crimes Code. TO WIT: On five (5) separate occasions, between the dates of June 1, 2006 and May 31, 2016, THE DEFENDANT did detain each of the four complainants (two times for complainant D.J.) while working in the capacity of a sworn police officer for the City of Wilkes-Barre. While each complainant was under such detention, custody and control of THE DEFENDANT, he compelled the complainants to perform oral sex on him (sexual intercourse per os) and/or have vaginal intercourse with him by threatening them with arrest or further police action if they did not comply. Each complainant then took THE DEFENDANTS penis into their mouths and/or had vaginal intercourse with him.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	3123	(a)(1)	of the	Title 18 , PA Crimes Code	3	F1		02A/11D
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Involuntary Deviate Sexual Intercourse

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did engage in deviate sexual intercourse per os or per anus with three (3) female complainants, namely, K.G., A.L. and H.E., by forcible compulsion, namely, while THE DEFENDANT was acting in the capacity of a sworn police officer for the City of Wilkes-Barre and in exchange of or in lieu of arrest, in violation of Section 3123(a)(1) of the PA Crimes Code. TO WIT: On three separate occasions, between the dates of June 1, 2006 and May 31, 2016, THE DEFENDANT did detain each of the three complainants while working in the capacity of a sworn police officer for the City of Wilkes-Barre. While each complainant was under such detention, custody and control of THE DEFENDANT, he compelled the complainants to perform oral sex on him by threatening them with arrest or further police action if they did not perform the oral sex on him. Each complainant then took THE DEFENDANTS penis into their mouth.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 06/26/19	OTN/LiveScan Number	Complaint/Incident Number X74-0041490
Defendant Name	First: ROBERT	Middle: MATTHEW	Last: COLLINS

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	5101		of the	Title 18 , PA Crimes Code	4	M2		260/
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (If applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):
Obstructing Administration of Law or Other Governmental Function

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did intentionally obstruct, impair, or pervert the administration of law or other governmental function by force, violence, physical interference or obstacle, breach of official duty, or any other unlawful act in violation of Section 5101 of the PA Crimes Code. TO WIT: Between June 1, 2006 and May 31, 2016, on four (4) separate occasions, THE DEFENDANT, while in police uniform and/or acting in the capacity of a sworn police officer for the city of Wilkes-Barre, did detain each of the complainants (K.G., D.J., A.L. and H.E.). During these detentions, THE DEFENDANT had the complainants perform sexual acts on him (oral sex) and/or had vaginal sexual intercourse with them by threatening them with arrest or further police action if they did not perform the sexual acts on him or allow the sexual contact by him. The complainants were compelled to comply with THE DEFENDANT due to his position as a police officer.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <i>06/26/19</i>	OTN/LiveScan Number	Complaint/Incident Number X74-0041490
Defendant Name	First: ROBERT	Middle: MATTHEW	Last: COLLINS

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

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	4	5301	(1)	of the	Title 18 , PA Crimes Code	4	M2		260/90Z
	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Official Oppression

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did act or purported to act in an official capacity or took advantage of such actual or purported capacity if, knowing that his conduct was illegal, he subjected another to arrest, detention, search, seizure, mistreatment, dispossession, assessment, lien or other infringement of personal or property rights. TO WIT: Between June 1, 2006 and May 31, 2016, on four (4) separate occasions, THE DEFENDANT, while in police uniform and/or acting in the capacity of a sworn police officer for the city of Wilkes-Barre, did detain each of the complainants (K.G., D.J., A.L., and H.E.). During these detentions, THE DEFENDANT had the complainants perform sexual acts on him (oral sex) and/or had vaginal sexual intercourse with them by threatening them with arrest or further police action if they did not perform the sexual acts on him or allow the sexual contact by him. The complainants were compelled to comply with THE DEFENDANT due to his position as a police officer.



POLICE CRIMINAL COMPLAINT

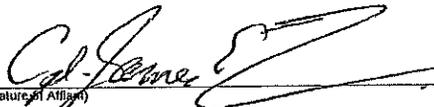
Docket Number:	Date Filed: 06/26/19	OTN/LiveScan Number		Complaint/Incident Number X74-0041490
Defendant Name	First: ROBERT	Middle: MATTHEW	Last: COLLINS	

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

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

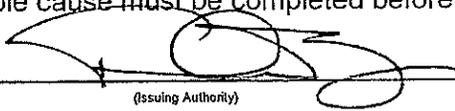
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

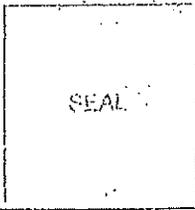
JUNE 26 - 2019
(Date)


(Signature of Affiant)

AND NOW, on this date, 6/26/19 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.

11-1-02
(Magisterial District Court Number)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <i>06/26/19</i>	OTN/LiveScan Number:	Complaint/Incident Number X74-0041490
Defendant Name:	First: Robert	Middle: Matthew	Last: COLLINS

AFFIDAVIT of PROBABLE CAUSE

YOUR AFFIANT has been a member of the Pennsylvania State Police since February of 1992 and was assigned to the Troop R, Blooming Grove, Criminal Investigation Unit from October of 1997 until February of 2013. YOUR AFFIANT was promoted to the rank of Corporal and assumed the position of Criminal Investigation Unit Supervisor, Troop R, Blooming Grove in February of 2013 and held that position until December of 2017. In December of 2017, YOUR AFFIANT became the Supervisor, Bureau of Criminal Investigation, Special Investigations Division, Eastern Organized Crime Task Force in Wilkes Barre and currently holds that position. During my tenure with the Pennsylvania State Police, YOUR AFFIANT has conducted and was associated with hundreds of criminal investigations, including investigations involving violations of the Pennsylvania Crimes Code, Title 18, Chapter 31 (Sexual Offenses) and has made dozens of felony arrests which resulted in convictions of these types of crimes.

The following interviews were conducted by members of the Pennsylvania State Police at various locations and on various dates;

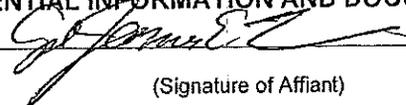
K.G. (White Female – 33 yoa) was interviewed and related the following information;

In the Summer of 2006, she was walking in the area of South Main Street near the Dollar General Store when she came into contact with THE DEFENDANT, Robert COLLINS. The time was between 4:45 PM and 5:30 PM. He was in uniform (Wilkes-Barre Police Department) and driving a marked police vehicle. She was walking when he pulled over to speak with her. He asked her if she was "clean" and asked if he could go through her belongings, which she agreed. He emptied the contents of her purse on the hood of his car. At the time, K.G. was taking Suboxone and had two pills in her possession and THE DEFENDANT informed her that because the pills were not in a bottle she would be charged. He informed her that if she wanted them

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

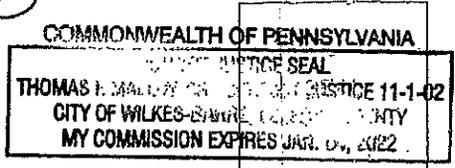
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


(Signature of Affiant)

Sworn to me and subscribed before me this 26th day of June 2019

Date _____, Magisterial/District Judge

My commission expires first Monday of January,





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: 06/26/19	OTN/LiveScan Number:	Complaint/Incident Number X74-0041490
Defendant Name:	First: Robert	Middle: Matthew	Last: COLLINS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

back, then "you'll take care of me or do something for me". K.G. related that she was aware of interactions that THE DEFENDANT had with prostitutes in the past but not of any "specifics" of what occurred. People she knew told her about doing sex acts with him to get out of trouble. She said to him that this "wasn't your first rodeo" referring to these interactions. She agreed to take a ride with THE DEFENDANT and got into the back of his marked Wilkes-Barre Police vehicle in order to get her pills back, however they were not returned. He drove her to Carlisle Street Off Carey Avenue in the city of Wilkes-Barre, Pa. K.G. asked THE DEFENDANT what she was supposed to do to get her pills back and if he was going to "jam her up". He relayed to her that if she "sucked his dick" he would give her pills back to her. THE DEFENDANT removed his gun belt but kept it in his possession and went into the back seat with her but did not close the door all of the way. He then unzipped his pants and they were down around his ankles. She said that she "sucked his dick" for about for about five minutes and stopped when she observed people in the area. She stated to him, "this is nuts and what if people see us". THE DEFENDANT then pulled his pants up and exited the back seat. K.G. indicated that THE DEFENDANT did not ejaculate and that she was never handcuffed. She got out of the car and her pills were not returned to her nor was she ever charged with anything surrounding that incident with THE DEFENDANT.

D.J. (Black Female – 26 yoa) was interviewed and related the following information;

In June of 2012, she was the passenger in a car with two other individuals when the car was pulled over for a bad inspection. She indicated that THE DEFENDANT, Robert COLLINS, pulled them over in a white marked Wilkes-Barre Police Department vehicle. Another officer was also there in a separate vehicle. This was in the area of the Pantry Quick near Academy Street in the city of Wilkes-Barre, Pa. She indicated that she was told by THE DEFENDANT that there was a warrant out for her arrest and was taken out of the car and handcuffed behind her back. The people in the car that she was in left the area as did the other officer. He asked her if she wanted to make the problem go away and get out of trouble, but she did not answer him. She was put into the backseat of his police car and he drove to the area of River Street and Wilkes University and turned onto a dirt road. By this time it was dark out and he parked the car on the dirt road and turned it off. He said something to her like "is there anything that you want to do", but again she did not answer. He removed her from the back seat and removed her handcuffs. He bent her over the back of the car and put a condom on. She indicated that she was wearing a sheer top with a black bra underneath, shorts and flip flops. He pulled her shorts and underwear down and took a condom out of his pants pocket. She indicated that he did not say anything to her and that she was crying "hysterically". She relayed during the interview that she did not want to go to jail and that she was scared. He had vaginal intercourse with her and she thinks that he ejaculated. When he was finished, he dressed himself and she dressed herself and he left her there and drove away. From there she walked to her aunt's house on River Street and called someone for a ride and went back home. She said that she did not tell anyone and said that she was taken to the police station and was given a court date and released.

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(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: 06/26/19	OTN/LiveScan Number:	Complaint/Incident Number X74-0041490
Defendant Name:	First: Robert	Middle: Matthew	Last: COLLINS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

In October or November of 2012, she had another incident involving THE DEFENDANT in the area of the Turkey Hill at the bottom of Hazle Street in the city of Wilkes-Barre, Pa. She was walking with her cousin and ran into another girl who she ended up in a physical confrontation with. Someone called the cops and officers showed up. This was sometime during the day and it was still light outside. When the officers ran her name over the radio a warrant popped up and she and the other girl were handcuffed. After about five minutes, THE DEFENDANT, showed up there in uniform and offered to transport her to the police station. The other officers, she believed that one of them was RAWFORD, left the area and then THE DEFENDANT put her into his marked Wilke-Barre Police Department vehicle, and everyone else left. Her handcuffs were in front of her this time and he put her in the backseat. There were no conversations between them and he did not ask her any questions. He drove to the area of Crown Fried Chicken and the Dollar Store in South Wilkes-Barre and then drove to a road behind the stores. He parked and turned the car off and she was still seated in the back, behind the driver's side. He opened the back door and pulled her legs so she was lying down with her head still against the door/window. She still had her handcuffs on in the front. He removed her pants and got in the back with her. He had already taken off his gunbelt and left it on the front seat of the car. He was on top of her and she saw him put a condom on. He had vaginal intercourse with her and she thinks that he ejaculated. He did not say anything to her while this was happening. When he was finished, he attempted to put her pants on but she finished dressing herself. He got out and put his gunbelt back on and then drove her to the police station where she was processed on the warrant. He stated to her that this was our secret and "if your in trouble you can always reach out". A check of Luzerne County Court of Common Pleas dockets via AOPC indicated an active Bench Warrant for D.J. issued on 10/24/12 which was lifted on 11/05/12 after video arraignment on the same date.

J.L. (White Female – 33 yo) was interviewed and related the following information;

In October/November of 2015, she was walking in the area of South Grant Street, near Park Avenue in the city of Wilkes-Barre, Pa. She was going to the Turkey Hill near the "bodega" when THE DEFENDANT, Robert COLLINS, approached her in an unmarked, white car. She indicated that she knew who THE DEFENDANT was, and that he was a police officer for Wilkes-Barre. He was in uniform at the time when he approached her and asked her name. She told her to wait, and then came back and asked to search her, which she agreed. She said that he found bags of heroin in her possession and he asked her what it was. She replied, "what do you think it is". He asked her if she wanted to make it disappear or if she wanted to go to jail and he told her that he wanted a blow job. She walked past the bodega to an alley and he was driving alongside her, and then he pulled off and parked. They walked down the alley and he took his penis out of his pants and she crouched down while he was standing and put his penis in her mouth. He asked her if she "spit or swallowed" and she told him that she spit. He ejaculated in her mouth and she let it go to the ground. After he finished, he let her keep the heroin and he left in his car.

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(Signature of Affiant)



**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:	Date Filed: 06/26/19	OTN/LiveScan Number:	Complaint/Incident Number X74-0041490
Defendant Name:	First: Robert	Middle: Matthew	Last: COLLINS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

H.E. (White Female – 46 yoa) was interviewed and related the following information;

In May of 2016, she was driving a friend's car when she was pulled over in the area of the High Street Turkey Hill in the city of Wilkes-Barre, Pa. She saw lights flashing and THE DEFENDANT, Robert COLLINS was in uniform when he pulled them over. He had known her from other encounters with her and she said to him, "please don't charge me". She indicated that she was in the car with two other passengers and THE DEFENDANT found paraphernalia on one of them and put him in his police car. At that time, when she was driving, H.E. did not have a valid driver's license. THE DEFENDANT asked if anyone had a license and the other passenger in the car did, so THE DEFENDANT let him drive the car and they left.

It was maybe days later when she was walking in the area of Carey Ave and Oregon Street. THE DEFENDANT pulled up to her and he was in uniform in a marked Wilkes-Barre police car. They were talking, and she asked him about the fines and if there was anything that she could do to get the charge taken care of. She got into the back seat of his car and they talked some more about the charges. He drove her over to the area by the Murray complex, off Pennsylvania Boulevard, and drove around the back of it. The place he parked was over by the Post Office, a high building with a lot of stories. They both got out of the car and he promised to take the fine away. When they got out of the car, he threw her down to the ground and she was upset about that and said that she was not going to be manhandled that way. She said that he unzipped his pants and pulled them down a little and he had his gun belt on still. She performed oral sex on him, that she put his penis in her mouth. After a little bit, they both heard a noise and it startled them. They thought that there was a person in the building and he looked with his flashlight, but they didn't see anyone. She said that at the time, it was dark or just getting dark out. She said that he did not ejaculate and that they were too scared that someone was there. He got into his car and he left her there to walk home. After that she thought that the fine would be taken away, but it wasn't.

Sometime after that, when she found out that the fine was not taken away, she went to the Wilkes-Barre Police Station to talk to him about it. She ended up talking to him in a room with an old, long table in it. When she was talking to him, he said something about why she was there, and she said because he didn't take the fine away. He mentioned something about her not finishing. He asked her to expose her breasts to him while they were in the room talking. H.E. did expose her breasts to him, but she wasn't sure if she pulled her shirt down or lifted it up. She said that the fines were never taken away.

A check of Luzerne County Magisterial District Court 11-1-01 dockets via AOPC indicated a Traffic Docket for H.E. for the date of 05/21/16. Charges for violations of Title 75 (Pa Vehicle Code), section 1543(a) (Driving While Operating Privileges are Suspended or Revoked) and 3323(b) (Duties at Stop Signs) were filed and the arresting officer is listed as THE DEFENDANT, Robert M. COLLINS.

All of the above information is not all that is known to YOUR AFFIANT, only that which is sufficient to establish probable cause.

(Signature of Affiant)