

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ALLEGHENY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

MDJ: PITTSBURGH MUNICIPAL COURT
Magisterial District Number: 05-0-03
Address: 660 FIRST AVENUE
PITTSBURGH, PA 15219

DEFENDANT: (NAME and ADDRESS):
JOSEPH VINCENT KUKLIS
First Name Middle Name Last Name Gen.
1828 WINCHESTER DRIVE PITTSBURGH, PA 15241

Phone: 412.350.6715

NCIC Extradition Code Type							
Felony - Full Extradition							
Distance: _____							
DEFENDANT IDENTIFICATION INFORMATION							
Docket Number <i>CR-640919</i>	Date Filed <i>8-12-19</i>	OTN/LiveScan Number G 845826-2	Complaint/Incident Number 43-1608	Request Lab Services? <input type="checkbox"/> Yes			
GENDER MALE	DOB 07/10/1971	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>			
RACE WHITE	First Name		Middle Name	Last Name	Gen.		
ETHNICITY	AKA						
HAIR COLOR	EYE COLOR BRO (BROWN)						
					WEIGHT (lbs.)		
DNA	DNA Location				180		
FBI Number	MNU Number			Ht. HEIGHT in			
Defendant Fingerprinted					6 01		
Fingerprint Classification							
DEFENDANT VEHICLE INFORMATION							
Plate #	State	Hazmat	Registration Sticker (MMYY)	Comm'l Veh. Ind.	School Veh.	Oth. NCIC Veh. Code	Reg. Same as Def.
VIN	Year	Make	Model	Style	Color	<input type="checkbox"/>	

Office of the attorney for the Commonwealth Approved Disapproved because: _____

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

SDAG PATRICK SCHULTE
name of the attorney for the Commonwealth

Patrick Schulte
(Signature of the attorney for the Commonwealth)

8-12-19
(Date)

I, LEE YINGLING (Name of the Affiant)	493 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of ATTORNEY GENERAL (Identify Department or Agency Represented and Political Subdivision)	PA0222400 (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have, therefore, designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at _____ 301 _____ PITTSBURGH CITY
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County _____ on or about 02/01/2017 0:01
(County Code)

2019 AUG 12 PM 1:22

RECEIVED



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. In addition, social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	911	B3	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number					<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description/Acts of the accused associated with this Offense:									
18 911B3 CORRUPT ORGANIZATION F1 1 COUNT									
The actor, employed by or associated with an enterprise, conducted or participated, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, namely, fraudulent business practice in violation of 18 Pa. C.S. §911(b)(3).									



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Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIJ

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	2	3922	A3	of the 18	4	F3		
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

Statute Description/Acts of the accused associated with this Offense:

18 3922A3 THEFT BY DECEPTION F3 4 COUNTS

The actor intentionally obtained or withheld property, namely, money over \$2,000 belonging to Pittsburgh Technical College by failing to correct a false impression which the actor previously created or reinforced or which the actor knew to be influencing another to whom the actor stood in a fiduciary or confidential relationship, in violation of 18 Pa.C.S. §3922(a)(3).

The actor intentionally obtained or withheld property, namely, money in the amount of \$40,000.00 belonging to Innovatus Imaging by failing to correct a false impression which the actor previously created or reinforced or which the actor knew to be influencing another to whom the actor stood in a fiduciary or confidential relationship, in violation of 18 Pa.C.S. §3922(a)(3).

The actor intentionally obtained or withheld property, namely, money in the amount of \$17,000.00 belonging to Digital Dream Labs by failing to correct a false impression which the actor previously created or reinforced or which the actor knew to be influencing another to whom the actor stood in a fiduciary or confidential relationship, in violation of 18 Pa.C.S. §3922(a)(3).

The actor intentionally obtained or withheld property, namely, money in the amount of \$12,000.00 belonging to IRA Logix, Inc. by failing to correct a false impression which the actor previously created or reinforced or which the actor knew to be influencing another to whom the actor stood in a fiduciary or confidential relationship, in violation of 18 Pa.C.S. §3922(a)(3).



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Defendant Name:	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	4101	A2	of the	18	6	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description/Acts of the accused associated with this Offense:

18 4101A2 FORGERY F3 6 COUNTS

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely fraudulent grant documents, so that it purported to be the act of another, namely Dept. of Community & Economic Development (Millie's Homemade Ice Cream grant), who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S.§4101(a)(2).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely fraudulent grant documents, so that it purported to be the act of another, namely Dept. of Community & Economic Development (Pittsburgh Technical College grant), who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S.§4101(a)(2).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely fraudulent grant documents, so that it purported to be the act of another, namely Dept. of Community & Economic Development (Digital Dream Labs grant), who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S.§4101(a)(2).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely fraudulent grant documents, so that it purported to be the act of another, namely Dept. of Community & Economic Development (Blank Concrete & Supply grant), who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S.§4101(a)(2).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely fraudulent grant documents, so that it purported to be the act of another, namely Dept. of Community & Economic Development (Innovatus Imaging grant), who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S.§4101(a)(2).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely fraudulent grant documents, so that it purported to be the act of another, namely Dept. of Community & Economic Development (IRA Logix, Inc. grant), who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when



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no such original existed, in violation of 18 Pa.C.S.§4101(a)(2).

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	4107	A6	of the	18	6	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
<input type="checkbox"/> PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone					

Statute Description/Acts of the accused associated with this Offense:

18 4107A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES F3 6 COUNTS

The actor, in the course of business, made a false or misleading written statement, namely fraudulent grant documents for the purpose of obtaining property or credit, namely money in the amount of \$6,000.00 from Millie's Homemade Ice Cream, in violation of 18 Pa.C.S.§4107(a)(6).

The actor, in the course of business, made a false or misleading written statement, namely fraudulent grant documents for the purpose of obtaining property or credit, namely money in the amount of \$12,000.00 from Blank Concrete & Supply, in violation of 18 Pa.C.S.§4107(a)(6).

The actor, in the course of business, made a false or misleading written statement, namely fraudulent grant documents for the purpose of obtaining property or credit, namely money in the amount of \$40,000.00 from Innovatus Imaging, in violation of 18 Pa.C.S.§4107(a)(6).

The actor, in the course of business, made a false or misleading written statement, namely fraudulent grant documents for the purpose of obtaining property or credit, namely money in the amount of \$17,000.00 from Digital Dream Labs, in violation of 18 Pa.C.S.§4107(a)(6).

The actor, in the course of business, made a false or misleading written statement, namely fraudulent grant documents for the purpose of obtaining property or credit, namely money in the amount of \$12,000.00 from IRA Logix, Inc., in violation of 18 Pa.C.S.§4107(a)(6).

The actor, in the course of business, made a false or misleading written statement, namely fraudulent grant documents for the purpose of obtaining property or credit, namely money in the amount over \$2,000.00 from Pittsburgh Technical College, in violation of 18 Pa.C.S.§4107(a)(6).



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Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

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

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

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

_____ 8-12-19 _____ *Lee A. York*
 (Date) (Signature of Affiant)

AND NOW, on this date Aug 12, 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.

05-0-04 _____ *[Signature]* _____
 (Magisterial District Court Number) (Issuing Authority)



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AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:

- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:
6/13/2019

2. HOW:

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

3. WHAT CRIMES:

- 18 3922 A3 THEFT BY DECEPTION
- 18 3922 A3 THEFT BY DECEPTION
- 18 3922 A3 THEFT BY DECEPTION
- 18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
- 18 3922 A3 THEFT BY DECEPTION
- 18 4101 A2 FORGERY
- 18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
- 18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
- 18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
- 18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
- 18 911 B3 CORRUPT ORGANIZATION
- 18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
- 18 4101 A2 FORGERY
- 18 4101 A2 FORGERY
- 18 4101 A2 FORGERY
- 18 4101 A2 FORGERY
- 18 4101 A2 FORGERY

4. WHERE CRIME(S) COMMITTED:

MULTIPLE LOCATIONS THROUGHOUT ALLEGHENY COUNTY



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5. **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



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Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

I, Lee A. Yingling, your Affiant, am a Special Agent employed by the Pennsylvania Office of Attorney General and am currently assigned to the Bureau of Criminal Investigations (BCI), Western Regional Office. I currently have twenty-seven years of law enforcement experience. Prior to employment with the Pennsylvania Office of Attorney General, your Affiant was employed for approximately eighteen years as a police officer with the Allegheny County Police Department, thirteen of those years as a detective and/or supervisor (Sergeant) of the homicide and narcotics units.

On June 13, 2019, the Office of General Counsel (OGC) referred to the OAG an investigation into fraudulent grant applications and awards made to the Pennsylvania Department of Community and Economic Development (DCED) made on behalf of various companies by Wellington Strategies - a company owned and operated by Joseph Kuklis. OAG accepted jurisdiction of the investigation pursuant to the Commonwealth Attorneys Act, 71 P.S. §732-205(a)(6).

Joseph Kuklis and Wellington Strategies

According to the company's website, Wellington Strategies is "a Pittsburgh based firm offering its clients a variety of government affairs consulting services including traditional lobbying, grassroots lobbying, public affairs, grant and contract identification, and writing services." Through the course of this investigation, your Affiant has learned that Wellington Strategies is owned and operated by Joseph Kuklis (hereinafter referred to as "Kuklis"). Your Affiant has also confirmed that Wellington Strategies is physically located at 100 W. Station Square Drive, Pittsburgh, PA 15219. On July 11, 2019, your Affiant visited the Wellington Strategies address to find it open for business and staffed with personnel. According to his LinkedIn profile, Kuklis has been the CEO of Wellington Strategies since 2015.

Pittsburgh Technical College

On February 25, 2019, DCED began receiving inquiries from representatives from Pittsburgh Technical College regarding the status of grant funding that the representatives alleged was awarded to the company from the Redevelopment Assistance Capital Program (RACP). The RACP is a Commonwealth of Pennsylvania grant program administered by the Office of Budget for the acquisition and construction of regional economic, cultural, civic, recreational, and historical improvement projects. On February 26, 2019, Brenda Psotka, Pittsburgh Technical College's Executive Director of Institutional Advancement, emailed Scott Bowman (a RACP Specialist) a photograph of a RACP grant award letter dated November 30, 2018. The letter, purportedly from RACP, stated that Pittsburgh Technical College received a RACP award of \$500,000 in grant monies. Psotka indicated to Bowman that the letter was given to the College by Joseph Kuklis of Wellington Strategies.

Bowman had no record of the aforementioned award on file with RACP. Upon consultation with people at the Office of Budget, Bowman determined that no one at the Office of Budget had any knowledge of an RACP award for the Pittsburgh Technical College nor did it appear that such a letter as possessed by Psotka appear to have been prepared for Pittsburgh Technical College. When asked, Psotka stated that the only copy of the letter anyone at Pittsburgh Technical College had was received directly from Kuklis in January of 2019. Psotka told Bowman that Pittsburgh Technical College employs Kuklis and Wellington Strategies as grant writers for the college.

Meanwhile DCED officials learned that on February 26, 2017 (two years earlier), DCED Deputy Chief Counsel Timothy Anstine received an email from Melissa Brown, a compliance manager from Pittsburgh Technical College, which included a \$150,000 grant offer letter from Gaming Economic Development and Tourism Fund (GEDTF). GEDTF is a grant program administered by DCED. The letter included an Acceptance of Offer form which requested various types of information about Pittsburgh Technical College. DCED Deputy Counsel Jill Busch and DCED Director of Community Enhancement Mandy Book reviewed the letter and determined that it was not legitimate and did not originate from DCED. That offer letter also came from Joseph Kuklis of Wellington Strategies. Upon review of the letter by DCED officials, it was clear to those officials that the letter was a forgery.



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Millie's Homemade Ice Cream

On May 21, 2019, Ryan Emerson (DCED Director of Business Financing - Grants Office) received a phone call from Lauren Townsend of Millie's Homemade Ice Cream inquiring about the status of grant funds that Millie's Homemade Ice Cream was awarded by DCED's Pennsylvania First grant. Pennsylvania First grant is a comprehensive funding tool to facilitate increased investment and job creation within the Commonwealth. According to Townsend, Millie's Homemade Ice Cream was awarded a \$50,000 Pennsylvania First grant. Emerson searched for Millie's Homemade Ice Cream in his system and was unable to find an application for Millie's Homemade Ice Cream on file with DCED.

Townsend indicated to Emerson that she had been working with Joseph Kuklis from Wellington Strategies. Townsend stated that she hired Kuklis on retainer to help Millie's Homemade Ice Cream get grant funds for an expansion project. On June 2, 2019, Townsend emailed Emerson a copy of the purported grant offer letter and an acceptance of offer form. As stated above, no grant offer is on file with DCED for Millie's Homemade Ice Cream and therefore the grant offer letter was illegitimate. Like the letter in the case of Pittsburgh Technical College, it was clear to DCED officials, after review, that the letter was a forgery.

Digital Dream Labs

On May 23, 2019, Jacob Hanchar of Digital Dream Labs contacted DCED inquiring about the status of grant funds awarded to Digital Dream Labs by DCED's Pennsylvania First grant. Emerson searched for Digital Dream Labs' application or any record relating to Digital Dream Lab in DCED's system and was unable to find any record or contract from that company. Hanchar indicated that he had worked with Joseph Kuklis of Wellington Strategies and was told by Kuklis that he had obtained a \$175,000 Pennsylvania First grant for Digital Dream Labs.

Later that same day, Mandy Book received a call from Hanchar inquiring about the status of Digital Dream Labs' GEDTF funds. Hanchar has emails originating from Joseph Kuklis on his grant offer as well, of which there is no record in the DCED databases of ever being applied for on behalf of Digital Dream Labs.

Innovatus and Bland Concrete & Supply

On July 18, 2019, your Affiant received communications from representatives of two (2) other companies - Innovatus Imaging and Blank Concrete and Supply. Both companies retained Joseph Kuklis and Wellington Strategies to apply for DCED grant monies for them, were told by Joseph Kuklis that they were awarded DCED grant money, and when representatives of the respective companies made inquiry with DCED about the status of the grant monies, they were told by DCED that they had no record whatsoever of their respective companies ever making application for DCED grants.

IRA Logix, Inc.

On August 8, 2019, during a meeting with Jacob Hanchar (owner of Digital Dream Labs), Hanchar indicated to your Affiant that your Affiant may want to speak with the owner of IRA Logix, Inc. - a company whom Hanchar stated has had similar experience with Kuklis. On August 9, 2019, Joe Hipsky (owner of IRA Logix, Inc.) contacted OAG and provided OAG with a March 20, 2019, letter purporting to be a communication letter and contract for a \$125,000 Pennsylvania First Grant award from DCED.

OAG sent the letter to DCED official Ryan Emerson to determine the letter's authenticity. Emerson indicated that the letter was in fact a forgery and that DCED did not have an application for IRA Logix, Inc. in their electronic application storage system. Hipsky indicated that IRA Logix, Inc. paid Kuklis \$12,000 for his work and has received no reimbursement from Kuklis.



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Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

On August 1, 2019, your Affiant conducted a trash pull at 1828 Winchester Drive, Pittsburgh, PA 15241, the residence of Joseph and Andrea Kuklis. One of the numerous items of evidentiary value recovered from the trash was a document that appeared to be from the Commonwealth of Pennsylvania, Department of Community and Economic Development, (DCED), Harrisburg, PA., to Innovatus Imaging. The "Grant Letter" had numerous signatures to include a signature by the Department of Community and Economic Development Secretary, Dennis M. Davin, dated May 1, 2019. Upon checking with the DCED they advised your Affiant that they had no record(s) of this document on file, nor that Innovatus Imaging had applied for any grant(s). DCED also stated that the signature of Secretary Dennis M. Davin was fraudulent.

On August 6, 2019, at approximately 9:15 AM, Agents from the PA Office of Attorney General executed a search warrant at 1828 Winchester Drive, Pittsburgh, PA 15241, the residence of Joseph and Andrea Kuklis. Joseph Kuklis was asked if he was the CEO/owner of Wellington Strategies and he said yes. Kuklis was asked if he was familiar with companies called Pittsburgh Technical College, Millie's Homemade Ice Cream, Digital Dream Labs, Innovatus Imaging and Blank Concrete & Supply. Kuklis said he was and that these companies are clients of Wellington Strategies. Kuklis was asked who at Wellington Strategies was responsible for these companies and Kuklis said he was. Kuklis was asked if anyone else worked with these companies from Wellington Strategies and Kuklis said no.

A box containing a number of paper files was seized in accordance to the search warrant. This box was recovered in a spare bedroom located at 1828 Winchester Drive, Pittsburgh, PA 15241. Joseph Kuklis informed your Affiant that this spare bedroom was used as his office while he was recovering from health issues. Kuklis informed your Affiant that he would conduct Wellington Strategies business using his cell phone and computer that were located inside the bedroom. Inside the box contained applications in reference to the DCED and Pittsburgh Technical College, Millie's Homemade Ice Cream, Digital Dream Labs, Innovatus Imaging, Blank Concrete & Supply, IRA Logix, Inc., and a number of other businesses.

Your Affiant respectfully requests an arrest warrant be issued for Joseph V. Kuklis for 18 PA.C.S. 911(b)(3) Corrupt Organization, 18 PA.C.S. 4101(a)(2) Forgery, 18 PA.C.S. 4107(a)(6) Deceptive or Fraudulent Business Practices, and 18 PA.C.S. 3922(a)(3) Theft by Deception.



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Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

I, LEE YINGLING, 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.

Lee C. Y. S.
(Signature of Affiant)

Sworn to me and subscribed before me this 12th day of AUGUST, 2019

8/12/19 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January,

**JAMES J. HANLEY, JR.,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-2-36
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2024**

