

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ALLEGHENY

MDJ: Hon. RONALD A. ARNONI

Magisterial District Number: 05-2-20

Address: BETHEL PARK MUNICIPAL BUILDING
2414 LYTLE ROAD, SUITE 200
BETHEL PARK, PA 15102

Phone: 412.835.1661



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

JOSEPH

VINCENT

KUKLIS

First Name

Middle Name

Last Name

Gen.

1828 WINCHESTER DRIVE PITTSBURGH, PA 15241

NCIC Extradition Code Type

Felony - Extradition Surrounding States Only

Distance: _____

ORIGINAL

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-38949	Date Filed SEP 17 2019	OTN/LiveScan Number G 848929-4	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
ETHNICITY	AKA			
HAIR COLOR XXX (UNK./BALD)			EYE COLOR BRO (BROWN)	
DNA	DNA Location			WEIGHT (lbs.) 175
FBI Number	MNU Number		Ft. HEIGHT In. 6 01	
Defendant Fingerprinted				
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. <input type="checkbox"/>
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).

PATRICK SCHULTE, SDAG
name of the attorney for the Commonwealth)

[Signature]
(Signature of the attorney for the Commonwealth)

9/16/19
(Date)

I, <u>LEE YINGLING</u> (Name of the Affiant)	<u>493</u> (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
of ATTORNEY GENERAL (Identify Department or Agency Represented and Political Subdivision)	<u>PA0222400</u> (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 _____ 123 UPPER ST CLAIR TWP (Subdivision Code) (Place-Political Subdivision)	
In Allegheny County 02 (County Code)	on or about 02/01/2017 0:01



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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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
X	1	3922	A3	of the	18	2	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3922A3 THEFT BY DECEPTION F3 2 COUNTS The actor intentionally obtained or withheld property, namely, money over \$2,000.00 belonging to Regional Learning Alliance 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 over \$2,000.00 belonging to McKeesport Preservation Society 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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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	2	4101	A2	of the	18	12	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 12 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 (Allegheny River Development 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 (It's About the Warrior Foundation 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 (Steel Bridge Consulting 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 (Rapid TPC, LLC 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 (Innovu 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 (Glen Montessori School 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



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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 (Seton Hill University 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 (Mt. Nebo Development LP 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 (Schell Games LLC 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 (Phipps Conservatory 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 (RE2 Robotics 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 (Alung Technologies 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).



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
Lead?	3	4107	A6
Offense#	of the	18	8
Section	Subsection	PA Statute (Title)	Counts
Grade	F3	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 4107A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES F3 8 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 \$10,000.00 from Allegheny River development, 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 \$5,000.00 from It's About the Warrior Foundation, 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 \$3,000.00 from Steel Bridge Consulting, 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 \$9,000.00 from Rapid TPC, LLC., 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 \$60,000.00 from Innovu, 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 \$16,400.00 from Glen Montessori School, 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 \$19,200.00 from Alung Technologies, 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 from July 2016 approximately \$36,000.00, or \$9,000.00 annually from Seton Hill University, in violation of 18 Pa.C.S.§4107(a)(6).



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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 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)

(Signature of Affiant)

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.

(Magisterial District Court Number)

(Issuing Authority)

SEAL



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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:
8/6/2019

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
Recovered documents, eyewitness statements & interviews
- b) How the source of information knows this particular person committed the crime:
First hand knowledge. search warrants and recovered documents
- c) How both Affiant and/or source of information knows that a particular crime has been committed:
Interviews and recovered documents

3. WHAT CRIMES:

18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
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
18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
18 3922 A3 THEFT BY DECEPTION
18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
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 3922 A3 THEFT BY DECEPTION
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
18 4101 A2 FORGERY



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4. **WHERE CRIME(S) COMMITTED:**

NUMEROUS LOCATIONS THROUGHOUT 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



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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 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 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 Toursim 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. The 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 grants 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 Labs 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 database 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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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 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 at home 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.

Based upon this information that came to your Affiant after Kuklis' August 12, 2019, charges, your Affiant reviewed documents recovered from the Kuklis residence pursuant to the aforementioned search warrant. There were purported DCED grant award letters in the cache of documents recovered from the Kuklis residence for the following entities: (1) Allegheny River Development; (2) It's About the Warrior Foundation; (3) Steel Bridge Consulting; (4) Rapid TPC, LLC; (5) Innovu; (6) Glen Montessori School; (7) Seton Hill University; (8) Mt. Nebo Development; (9) Schell Games, LLC; (10) Phipps Conservatory; (11) RE2 Robotics; and (12) Alung Technologies. These DCED grant letters were identical to the letters that resulted in Kuklis' August 12, 2019 charges, but for the name of the company being awarded the grant and the amount of grant monies awarded.

Ryan Emerson of DCED was contacted to review the above-referenced twelve (12) letters. Upon review, Emerson indicated that all twelve (12) letters did not originate from DCED and were in fact not authentic letters.

Contact was made with representatives of the entities that were named in the fraudulent DCED letters. Representatives of the following entities asserted that they detrimentally relied upon the grant letters to make capital expenditures in anticipation that they would be receiving grant monies: (1) Allegheny River Development; (2) It's About the Warrior Foundation; (3) Steel Bridge Consulting; (4) Rapid TPC, LLC; (5) Innovu; (6) Seton Hill University; and (7) Alung Technologies, and (8) Glen Montessori School.

The amount of grant monies promised in each of the fraudulent grant letters was well in excess of \$2,000.

Two other companies, Regional Learning Alliance and McKeesport Preservation Society, paid Kuklis in excess of \$2,000 in consulting fees for Kuklis to (among other things) write and/or apply for DCED grants on their behalf. According to representatives of both entities, Kuklis told them that he (Kuklis) had secured for them DCED grant monies. According to Ryan Emerson of DCED, Kuklis' assertions to these entities about DCED awarding them grant monies was not true.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 848929-4	Complaint/Incident Number 43-1608
Defendant Name	First: JOSEPH	Middle: VINCENT	Last: KUKLIS

Your Affiant respectfully requests an arrest warrant be issued for Joseph Kuklis charging him with an additional 12 counts of Forgery, 8 counts of Deceptive or Fraudulent Business Practices, and 2 counts of Theft by Deception.

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 Yingling
(Signature of Affiant)

Sworn to me and subscribed before me this 17 day of SEPT, 2018
[Signature] Date , Magisterial District Judge

My commission expires first Monday of January,

