

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: DAUPHIN

Magisterial District Number: 12-1-02  
MDJ: Hon. Barbara Pianka  
Address: 2967-A North 7<sup>th</sup> Street Harrisburg,  
PA 17110

Telephone: (717)238-3388



DEFENDANT  
BRADLEY  
First Name

POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA

VS.

(NAME and ADDRESS):

ADAM WINNICK  
Middle Name Last Name

Gen

909 Espenshade Court Hummelstown, PA 17036

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Limited
- 3-Felony Surrounding States
- 4-Felony No Extradition
- 5-Felony Pending Extradition
- 6-Felony Pending Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending Extradition
- F-Misdemeanor Pending Extradition

Distance: \_\_\_\_\_

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR 418-19</u>	Date Filed <u>10/3/19</u>	OTN/LiveScan Number <u>U755957-4</u>	Complaint/Incident Number <u>39-711</u>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>10/15/1971</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name		Last Name
AKA				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number			Ft. HEIGHT In.
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:			<u>5</u> <u>6</u>

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	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).

SDAG KIRK HANDRICH

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

10/3/19

(Date)

I, ASHLEY BOSCH

(Name of the Affiant)

BADGE #554

(PSP/MPOETC -Assigned Affiant ID Number & Badge #

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(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 [ ]

(Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MAY 2017 THROUGH NOVEMBER 2017



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 39-711
Defendant Name:	First: BRADLEY	Middle: ADAM	Last: WINNICK

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.)

<b>Inchoate Offense</b>	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	1	3926	(b)	of the	18 PA C.S.A.	2	F-3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	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): **SECTION 3926 (B): THEFT OF SERVICES**

Acts of the accused associated with this Offense: The Defendant, by his own conduct, had control over the disposition of services, namely the Dauphin County Public Defender employees and knowingly diverted such services to benefit another. TO WHIT: The Defendant, Bradley Winnick, used Dauphin County Public Defender employees to do campaign work at the county polling stations during both 2017 elections resulting in \$13,397.58 of Dauphin County compensatory leave being used.

<b>Inchoate Offense</b>	<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 _____
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<input type="checkbox"/>	2	4911	(a)(1)	of the	18 PA C.S.A.	1	F-3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	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): **SECTION 4911 (A)(1): TAMPERING OF PUBLIC RECORDS**

Acts of the accused associated with this Offense: The Defendant by his own conduct, knowingly made a false entry to a document that was kept by a government employee for payroll records. TO WIT: The Defendant, Bradley Winnick provided the Dauphin County Public Defender's Office Administrator documents that detailed various hours of earned comp time for those employees who submitted accrued Dauphin County leave to work the county polling stations during the 2017 elections.

<b>Inchoate Offense</b>	<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 _____
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<input type="checkbox"/>	3	1103	(a)	of the	65 PA C.S.A.	1			
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

<b>PennDOT Data (if applicable)</b>	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): **SECTION 1103 (A): CONFLICT OF INTEREST**

Acts of the accused associated with this Offense: The Defendant did participate in conduct that constitutes a conflict of interest. TO WHIT: The Defendant, Bradley Winnick, did issue a total of \$26,265.92 in compensatory leave to Dauphin County Public Defender employees for doing campaign work at the county polling stations during the 2017 elections.



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<b>Inchoate Offense</b>	<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 _____
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<input type="checkbox"/>	Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>									

<b>PennDOT Data (if applicable)</b>	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance):				
Acts of the accused associated with this Offense: .				

<b>Inchoate Offense</b>	<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 _____
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<input type="checkbox"/>	Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>									

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

<b>Inchoate Offense</b>	<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 _____
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<input type="checkbox"/>	Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<input type="checkbox"/>									

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



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 39-711
Defendant Name:	First: BRADLEY	Middle: ADAM	Last: WINNICK

- 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 1 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.)**

OCTOBER 3<sup>RD</sup>  
(Date)

2019  
(Year)

*Ashley Bean*  
(Signature of Affiant)

AND NOW, on this date 10-3-19 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.

12-1-02  
(Magisterial District Court Number)

*Barbara J. Franke*  
(Issuing Authority)







# POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: BRADLEY	Middle: ADAM	Last: WINNICK

## AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Ashley Bosch, is employed as a Special Agent with the Pennsylvania Office of Attorney General (PAOAG) and is currently assigned to the Bureau of Criminal Investigations, Public Corruption Unit. Your Affiant has over 9 years of combined law enforcement experience as a Special Agent and as a Police Officer within the Commonwealth of Pennsylvania.

During the month of February, 2019, the Pennsylvania Office of Attorney General received a complaint alleging that Bradley Winnick, the Chief Public Defender of Dauphin County, Pennsylvania, unlawfully compensated his employees at the Dauphin County Public Defender's Office, hereinafter will be referred to as DCPD, with compensatory (comp) time off from their Dauphin County position for conducting Election Day campaign work. Moreover, the OAG investigation revealed that Winnick unlawfully paid "double comp time" (he provided these employees with two hours off from work for every hour that they worked at a polling location) for working the polls during the Primary and General Judicial Elections in 2017. Members of the OAG also obtained text messages and emails from Winnick in which he advised members of his Public Defender staff that they would be compensated with time off from their position for conducting campaign work at the polling locations on Election Day(s) in 2017.

During the month of April 2019, members of the OAG interviewed a witness involved in this investigation who will be referred to as Witness #1. Witness #1 was employed by the Dauphin County Public Defender's Office during the time of the alleged crimes. Witness #1 said that his/her supervisor was Bradley Winnick and Winnick asked if he/she were interested in working the polls on Election Day. Witness #1 was told he/she would have to use a vacation day to work the polls, but that Winnick would compensate him/her with double comp time. This work was to include handing out material at the polls and asking people to vote for a certain candidate. Winnick informed witness #1 that the polls are open from 7AM until 8PM so he/she would receive 26 hours of comp time for working during this time. Witness #1 agreed to work the polls for Winnick and did submit leave from the DCPD office on November 7, 2017, to work the polls. Witness #1 was compensated with 26 hours of comp time at the DCPD office by Winnick.

During the month of April 2019 members of the OAG interviewed a witness involved in this investigation who will be referred to as witness #2. Witness #2 was employed by the Dauphin County Public Defender's Office during the time of the alleged crimes. Witness #2 admitted that he/she worked the polls on Election Day, November 7, 2017, after he/she attended court on that date. Witness #2 first learned about comp time being awarded for working the polls when Winnick advised him/her that a group of employees from their office would be awarded compensation at the rate of one and one-half times the normal rate to help with the campaign. Witness #2 then heard about comp time being earned for working the polls during a conversation with a co-worker who said comp time was being awarded at the rate of double comp time for each employee who works at the polling stations on Election Day. Witness #2 also heard other DCPD employees discussing how they planned to utilize the comp time they earned for working the polls. Witness #2 did not recall if comp time was awarded to him/her or if he/she used the time that was awarded.

During the month of May 2019, members of the OAG interviewed a witness involved in this investigation who will be referred to as witness #3. Witness #3 was employed by the Dauphin County Public Defender's Office during the time of the alleged crimes. Witness #3 stated that it was common practice for members of the DCPD's office to be involved in most elections. Witness #3 stated employees would participate in literature drops and petitions to nominate a candidate for political office. Witness #3 is only aware of these employees being compensated for this election work during the judicial elections of 2017. Witness #3 used leave from his/her position at the DCPD's office to work the polls on Election Day. In return for this work, witness #3 was compensated with comp time.



# POLICE CRIMINAL COMPLAINT

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During the month of May 2019, members of the OAG interviewed a witness involved in this investigation who will be referred to as witness #4. Witness #4 was employed by the DCPD's Office during the time of the alleged crimes. Witness #4 participated in the Dauphin County Judicial elections of 2017, and performed literature drops, obtained signatures on nominating petitions and other campaign work. Witness #4 stated that most of the campaign work was completed after work hours and on the weekends. Witness #4 also worked at multiple polling locations for the primary election on May 16, 2017. Witness #4 was advised by his/her supervisor at the DCPD's Office, Bradley Winnick that double comp time was being provided to the DCPD employees that worked the polling stations on election day.

During the month of May 2019, members of the OAG interviewed a witness involved in this investigation who will be referred to as witness #5. Witness #5 was employed by DCPD's Office during the time of the alleged crimes, and Witness #5 did participate in political activities in the spring of 2017. Witness #5 stated that he/she would participate in petition and literature drops and work was performed after work hours or on weekends. Prior to the primary election on May 16, 2017, witness #5 received an email from his/her supervisor at the DCPD's Office, Bradley Winnick, regarding the upcoming Election Day. Winnick, in his email was directing the employees at the DCPD's Office to advise the office administrator of their court schedules to assess their availability at the polling locations on Election Day. Moreover, this email directed the staff to email the office administrator when they arrived and left the polling stations on Election Day so that this time could be recorded. Witness #5 stated he/she did email the office administrator his/her hours for working the polls but did not recall if he/she was compensated for working the polls. Witness #5 also provided members of the OAG with text messages from Winnick in which he wanted to know if Witness #5 was able to work at the polling locations after court on primary Election Day. The text message also offered double comp time for each hour worked at the polling location. Witness #5 did work at the polling location for double comp time.

During the month of May 2019, members of the OAG interviewed a witness involved in this investigation who will be referred to as witness #6. Witness #6 was employed by the DCPD's Office during the time of the alleged crimes, and witness #6 did participate in political activities during the primary and general elections of 2017. Witness #6 stated that most of this election activity was performed after work hours and on weekends. Witness #6 was approached by his/her supervisor at the DCPD's Office, Bradley Winnick, who offered Witness #6 double comp time for working at the polling locations on Election Day. Witness #6 agreed to work the polling locations and took leave from work on these days. Witness #6 reported his/her hours to the office administrator who recorded his/her comp time.

As a part of this investigation members of the OAG interviewed the DCPD's Office administrator who is responsible for recording staff time and attendance, payroll and other responsibilities. According to the office administrator, the office head, Bradley Winnick, provided double comp time off for every hour their employees worked at the polling locations for the primary and general elections in 2017. The Office Administrator provided members of the OAG with records provided to him/her by Winnick of each employee who earned comp time off for working at the polls on Election Day.

As a part of this investigation members of the OAG interviewed Bradley Winnick. During this interview, Winnick confessed to providing his DCPD's Office employees comp time off from work, at the rate of two hours off from their county position, for every hour that they worked at a polling location during the primary and general elections of 2017. Winnick said that it was his sole decision to provide his employees with this benefit for working at the polling locations on Election Day.



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Your Affiant reviewed the records received from the DCPD's office administrator and was able to identify those employees who worked the polls during the two elections and each employees pay rate. Your Affiant determined that Winnick granted his employees \$26,265.92 in comp time between the two election days. During the primary election, Winnick issued \$16,332.36 of comp time. The employees used \$9,944.28 of that amount. During the general election, Winnick granted his employees \$9,933.56 in comp time and the employees used \$3,453.30 of that time.

Based on the aforementioned facts, your Affiant, respectfully requests an arrest warrant be issued for the defendant, Bradley Winnick.

I, ASHLEY BOSCH, 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.

*Ashley Bosch*

(Signature of Affiant)

Sworn to me and subscribed before me this 3 day of

October 2019

Date

*Dorothy J. Rank*

, Magisterial District Judge

My commission expires first Monday of January, 2024

