

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: NORTHUMBERLAND



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

Magisterial District Number: 08-3-04  
MDJ: Hon. MICHAEL P. TOOMEY  
Address: 399 S. 5<sup>TH</sup> ST.  
SUNBURY, PA 17801

DEFENDANT: (NAME and ADDRESS):  
JENIFER LEE CURCIE  
First Name Middle Name Last Name Gen  
1471 WABASH ST., COAL TOWNSHIP, PA 17866

Telephone: (570)988-4485

NCIC Extradition Code Type

- |   |   |  |  |
|---|---|--|--|
| <input type="checkbox"/> 1-Felony Full                      | <input type="checkbox"/> 5-Felony Pending Extradition         | <input type="checkbox"/> C-Misdemeanor Surrounding States  | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited                   | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition      |  |
| <input type="checkbox"/> 3-Felony Surrounding States        | <input type="checkbox"/> A-Misdemeanor Full                   | <input type="checkbox"/> E-Misdemeanor Pending Extradition |  |
| <input checked="" type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited                | <input type="checkbox"/> F-Misdemeanor Pending Extradition |  |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR 378-19	Date Filed 10/10/19	OTN/LiveScan Number U75P539-5	Complaint/Incident Number 21-1694	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 07/22/1979	POB New York	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 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 type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input checked="" 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 checked="" type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) 260
FBI Number 15V87VJWT	MNU Number			Ft. HEIGHT In. 5 7
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
Fingerprint Classification:				

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).

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, SA RALPH RALSTON/INV. VICTORIA A. O'NEILL (Name of the Affiant)	BADGE #527 /BADGE #010 (PSP/MPOETC -Assigned Affiant ID Number & Badge #)
PA Office of Attorney General	
of PA Office of State Inspector 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 [302] 320 Chestnut St., Sunbury, Pa  
(Subdivision Code) (Place-Political Subdivision)

in NORTHUMBERLAND [49] on or about JULY 2015-APRIL 2018  
County (County Code)



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 21-1694
Defendant Name:	First: JENIFER	Middle: LEE	Last: CURCIE

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.)

<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	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/> Lead?	1	3922	(A)	of the	TITLE 18	1	F3		
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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the above named defendant did intentionally obtain or withhold property of another by deception when she created or reinforced a false Impression, including false impressions as to law, value, intention or other state of mind. To wit: between July 2015 and April 2018, the defendant, who was employed by the Northumberland County Assistance Office, impermissibly accessed Department of Human Services case records of eight eligible recipients and took possession of recipients Electronic Benefits Cards (EBT). The defendant also accessed the EBT customer service line to view account balances. The EBT cards were used by Curcie to make unauthorized purchases with EBT cards resulting in a loss of \$8,621.44 in public assistance funds.

<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	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	2	481	(A)	of the	TITLE 62	1	F3		
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): **FALSE STATEMENTS**

Acts of the accused associated with this Offense: In that the above named defendant, by means of a willfully false statement or misrepresentation or by impersonation or by willfully failing to disclose a material fact regarding eligibility or other fraudulent means, secures or attempts to secure or aids or abets or attempts to aid or abet any person in securing assistance or Federal food stamps. To wit: between July 2015 and April 2018, the defendant, who was employed by the Northumberland County Assistance Office, impermissibly accessed Department of Human Services case records of eight eligible recipients and took possession of recipients Electronic Benefits Cards (EBT). The defendant also accessed the EBT customer service line to view account balances. The EBT cards were used by Curcie to make unauthorized purchases with EBT cards resulting in a loss of \$8,621.44 in public assistance funds.

<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	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?				of the					
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):

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 21-1694
Defendant Name:	First: JENIFER	Middle: LEE	Last: CURCIE

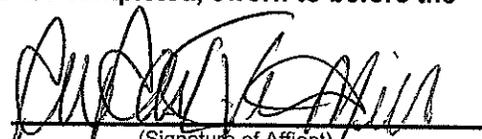
- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties 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 3.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently that non-confidential information and documents.

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

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

OCTOBER 10, 2019

(Date)

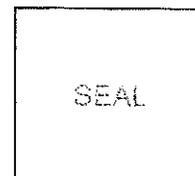
  
(Signature of Affiant)

AND NOW, on this date 10/10/19 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.

88-3-04  
(Magisterial District Court Number)

  
(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

<b>Docket Number:</b>	<b>Date Filed:</b> / /	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> 21-1694
<b>Defendant Name:</b>	<b>First:</b> JENIFER	<b>Middle:</b> LEE	<b>Last:</b> CURCIE

**AFFIDAVIT of PROBABLE CAUSE**

The Pennsylvania Office of State Inspector General (OSIG) received a complaint from the Pennsylvania Department of Human Services (DHS) asking the OSIG to investigate whether Jenifer L. Curcie, a former Income Maintenance Caseworker (IMCW) with the Northumberland County Assistance Office (NCAO), had improperly used Electronic Benefit Transfer (EBT) cards of public assistance recipients for her personal gain.

The DHS request occurred after the Pennsylvania State Police (PSP) had filed criminal charges against Curcie in Northumberland County for similar conduct. On 5/5/2018, a public assistance recipient filed a police report with Trp. David Boucher at PSP Stonington. The recipient alleged that they had applied for assistance at the NCAO and never received it (EBT card #2213). They reported this to the NCAO, which issued her another EBT card (#2312). The recipient attempted to use the new card and learned that there were no funds available on the account. The NCAO investigated and discovered that transactions had been made on EBT card #2213 at Weis Markets in Coal Township and Danville without the recipient's knowledge.

Trp. Boucher conducted a detailed investigation and subsequently obtained Weis Market video surveillance photos of the suspects. He identified the defendant and her son, Trent Curcie, as using the recipients EBT card at the aforementioned locations. When Curcie became aware that she was the target of the PSP investigation, she attempted to cover up the incident by authoring a letter on NCAO letterhead citing an error in assistance accounts and signing a fictitious name of a non-existent NCAO supervisor. Trp. Boucher subsequently filed charges in Northumberland County against both individuals. The PSP investigation alerted DHS of Curcie's criminal activity, which created the need for an in-depth investigation into Curcie's access and use of the public assistance database.

During Curcie's prosecution in the original PSP case, the OSIG found evidence that Curcie had allegedly used, without authorization, seven (7) additional EBT cards between 2012 and 2018 in seven (7) separate Pennsylvania counties. She reportedly used the cards to buy more than \$11,800 of food items for personal gain.

After the OSIG notified Northumberland County District Attorney Tony Matulewicz of the investigative findings of your co-affiant, Special Investigator Victoria A. O'Neill, he "nolle prossed without prejudice" the initial charges filed against Curcie by Trp. Boucher. Co-affiant O'Neill's findings revealed that Curcie: 1) impermissibly accessed Department of Health Services (DHS) records to obtain personal recipient information; 2) contacted DHS' automated system to create Electronic Benefit Transfer (EBT) card personal identification numbers (PIN) and retrieved EBT card balances; 3) used EBT cards issued to eligible, low-income individuals who were awarded Supplemental Nutrition Assistance Program (SNAP) benefits without their apparent knowledge, authorization, or consent; 4) surreptitiously removed additional EBT cards from the Northumberland County Assistance Office; 5) used eight (8) known EBT cards over the past six (6) years [3/2012 - 4/2018]; 6) obtained in excess of \$11,000 of unqualified SNAP benefits for herself or her family; and 7) made over forty (40) balance inquiries on eight (8) of the unqualified EBT cards between 7/2015 and 4/2018.

Co-affiant Ralston contacted the aforementioned recipients and discovered that the majority either never received their EBT cards, had never applied for benefits or never received benefits they had applied for. One recipient had died prior to their benefits being used by Curcie or others. Two recipients were associated with Curcie or her family members. In one of those instances, the recipient allowed Curcie's family members to use her EBT card to obtain goods for her while she was pregnant and unable. The remaining recipient was a neighbor of Curcie's whose wife became terminally ill. The recipient applied for benefits after Curcie suggested he do so. The recipient was too embarrassed to use the EBT card himself and asked Curcie or other friends to accompany him to stores to obtain food items.

The initial loss due to unauthorized use of EBT cards was determined to be in excess of \$11,000. After determining that two recipients authorized Curcie, her family members or their friends to use their EBT cards, the loss figure decreased to \$8,621.44.





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On 10/9/2019 Curcie was interviewed by your affiants in the presence of her attorney. Curcie explained that the cards she used were unclaimed or returned, either by a recipient who no longer qualified for benefits or by the postal service. Her job was to attempt to locate and contact the recipients. Sometimes the cards would sit on her desk for long periods of time. Curcie said she did not have the ability to access or create EBT cards, although she admitted to checking balances by phone and using cards that had remaining balances. Curcie was provided with the names of all victim recipients and identified the majority of those whose EBT cards were used without authorization.

Curcie cooperated and completed a written statement.

I, SA RALPH RALSTON/INV. VICTORIA A. O'NEILL, 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 10<sup>th</sup> day of October 2019  
 \_\_\_\_\_ Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2024

