

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WASHINGTON

Magisterial District Number: 27-1-01
MDJ: Hon. Robert W. Redlinger
Address: 90 Chestnut Street Suite 200
Washington, PA 15301

Telephone: (724)228-6218



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

MARISA

P

MAGNELLI

First Name

Middle Name

Last Name

Gen

104 Lynnwood Avenue
Belle Vernon, PA 15012

NCIC Extradition Code Type

<input type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 6-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 type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>19-597-19</u>	Date Filed <u>OCT 21 2019</u>	OTN/LiveScan Number <u>U 11012743</u>	Complaint/Incident Number <u>BN5013019C</u>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB <u>01/16/1963</u>	POB	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input type="checkbox"/>			
First Name		Middle Name	Last Name	Gen.			
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 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"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)			
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> OXX (Unknown)			
DNA <input type="checkbox"/> YES <input checked="" 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:		5	1			
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. NC C 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) 11/1

I, ERIN P KABLER (Name of the Affiant) 470 (PSP/MP/OTC -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 [63003] (Subdivision Code) City Of Washington (Place/Political Subdivision).

in WASHINGTON County [63] (County Code) on or about 2016 THROUGH 2019



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN 5013019C
Defendant Name	First: MARISA	Middle: P.	Last: MAGNELLE

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate:
 (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) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A	
X	1	4101	A1	of the	18	5	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 4101A1 FORGERY F3 5 COUNTS

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 1 Prescription for Schedule II Controlled Substance, of Henry Folb, M.D., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 21 Prescriptions for Schedule II Controlled Substance, of Allison Verenna, M.D., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 8 Prescriptions for Schedule II Controlled Substance, of Rebecca Shaffer, D.O., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 39 Prescriptions for Schedule II Controlled Substance, of Ereny Eskarous, M.D., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).

The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 1 Prescription Schedule II Controlled Substances, of Erin Shaffer, PA-C, who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A	
	2	903	(A)(1)	of the	18	3	F	
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:

18 903(A)(1) CRIMINAL CONSPIRACY F 3 COUNTS

The actor, with the intent of promoting or facilitating the crime of 35: 780-113: A12 conspired and agreed with Kenneth Bltkowski that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).

The actor, with the intent of promoting or facilitating the crime of 35: 780-113: A12 conspired and agreed with Edward Bulko that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).

The actor, with the intent of promoting or facilitating the crime of 35: 780-113: A12 conspired and agreed with Erika Stover that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN 5013019C
Defendant Name	First: MARTSA	Middle: D.	Last: MAGNELLI

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
Lead?	3	780-113	A12	of the	35	2	F	NCIC Offense Code	UCR/NIBRS Code
PA Statute (Title)	Counts	Grade	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:									
35 780-113A12 PROHIBITED ACTS F 2 COUNTS									
The actor knowingly and intentionally acquired or obtained possession of Hydrocodone (4-27-2019), a controlled substance, from Rite Aid #10891 by misrepresentation, fraud, forgery, deception or subterfuge, in violation of 35 P.S. §780-113(a) (12).									
The actor knowingly and intentionally acquired or obtained possession of Tylenol #3 (2-26-2019), a controlled substance, from Giant Eagle # 0053 by misrepresentation, fraud, forgery, deception or subterfuge, in violation of 35 P.S. §780-113(a) (12).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
Lead?	4	4120	A	of the	18	5	M1	NCIC Offense Code	UCR/NIBRS Code
PA Statute (Title)	Counts	Grade	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 4120A IDENTITY THEFT M1 5 COUNTS									
The actor possessed or used, through any means, identifying information of another person, namely Ereny Eskarous, M.D., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									
The actor possessed or used, through any means, identifying information of another person, namely Henry Folb, M.D., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									
The actor possessed or used, through any means, identifying information of another person, namely Allison Verenna, M.D., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									
The actor possessed or used, through any means, identifying information of another person, namely Erin Shaffer, D.O., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									
The actor possessed or used, through any means, identifying information of another person, namely Rebecca Shaffer, PA-C, without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									

POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number BN5013019C
Defendant Name:	First: MARISA	Middle: P	Last: MAGNELLI

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 consists of the preceding page(s) numbered 1 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) #400

AND NOW, on this date Oct. 21, 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.

27-1-01
 (Magisterial District Court Number)


 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
			BN 5013019C
Defendant Name	First:	Middle:	Last:
	MARISA	P.	MAGNELLI

1. Your Affiant, Erin P. Kabler, (hereinafter referred to as Kabler) is a narcotics agent employed by the Pennsylvania Attorney General, Bureau of Narcotics Investigation and Drug Control and is currently assigned to the Narcotics Division, Region V Office, North Huntingdon, PA. As such, I am empowered to conduct investigations into violations of various laws of the Commonwealth including PA Act 64 "Controlled Substance, Drug, Device and Cosmetic Act." During the course of such investigations, I am authorized to apply for, obtain and serve search warrants, make seizures and arrests.

2. Kabler has been a law enforcement officer since 2003. From 2003 to 2018, your affiant was employed by the City of Johnstown Police Department in Pennsylvania and was assigned to the Patrol Division. Your affiant held the rank of Patrol Sergeant. Kabler has received specific training in methods of drug law enforcement from the Pennsylvania Office of Attorney General, Pennsylvania State Police, the Cambria County Drug Task Force, Institute for Law Enforcement Education, PA, DUI Association, Indiana University of Pennsylvania, and Desert Snow Drug Interdiction. Kabler is familiar with tactics used by narcotics traffickers to elude the efforts of law enforcement while participating in the sale, acquisition and misrepresentation of illegal and scheduled drugs. Kabler has personally participated in an excess of 200 narcotic investigations, which included utilizing confidential informants, and controlled purchase of narcotics.

3. In June of 2019, Director of Pharmacy Washington Health Systems, Jeremy Funkhouser reported that one Marisa Magnelli forged/altere d prescription for controlled substances.

4. Marisa Magnelli was a former employee in the Washington Health System where she worked as a medical assistant. Magnelli was a "floater" meaning she would work in several physician's offices in Washington County.

5. Washington Health Systems participates in an information exchange with other health systems. The software, Clinical Connect, ties in all patient charts from every entity within the Washington Health System. Clinical Connect has the capability to look at each date transaction and reference to an algorithm.

6. During routine audit, Information Systems noted that demographics were changed by the same Medical Assistant, Marisa Magnelli, on several prescriptions.

7. Initial audit by Denis Abraham, Manager of Ambulatory Systems, found twenty-eight (28) prescriptions forged/altere d.

8. A more extensive audit revealed that Magnelli accessed patient records forty-six (46) in 2017 through 2019.

9. Audit tracked Magnelli accessing patient records and changing the demographics in order to print out prescriptions for controlled and non-controlled substances in her name as well as Erika Stover (daughter), Edward Bulko (ex-boyfriend) and Kenneth Bitkowski (husband).

10. After printing the prescriptions out, Magnelli would then change the demographics back to the original patient.

11. During the month of June 2019, Giant Eagle Pharmacies, Rite Aid Pharmacy, and CVS Pharmacy were visited after they were identified by PDMP as pharmacies where the identified prescriptions were passed.

12. On June 5, 2019 CVS Pharmacy #4077 975 Rostraver Road Belle Vernon, PA 15012 was visited in the attempt to recover forged prescriptions. Pharmacist Laurie Cilmes assisted by providing patient profiles on Erika Stover and Kenneth Bitkowski.

13. Patient Profile showed that Erika Stover purchased and received a prescription for Hydrocodone 7.5-325mg #60 on April 27, 2019. That prescription was allegedly signed by Rebecca Thomas, PA-C. Prescription #1470639 seized as evidence.

14. Patient Profile showed that Kenneth Bitkowski purchased and received a prescription for Hydrocodone 7.5-325mg #60 on April 27, 2019. That prescription was allegedly signed by Ereny Eskarous, M.D. Prescription #1474616 seized as evidence.

15. On June 5, 2019 Rite Aid Pharmacy #10891 Belle Vernon, PA 15012 was visited in the attempt to recover forged prescriptions. Pharmacist assisted by providing patient profiles on Erika Stover and Marisa Magnelli.

16. Patient Profile showed that Erika Stover purchased and received a prescription for Oxycodone 10mg #90 on April 27, 2019. That prescription was allegedly signed by Rebecca Thomas, PA-C. Prescription # 0596895 seized as evidence.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
			BN 5013619C
Defendant Name	First:	Middle:	Last:
	MARISA	P.	MAGNELLI

17. Patient Profile showed that Marisa Magnelli purchased and received a prescription for Hydrocodone 7.5-325mg #60 on April 27, 2019. That prescription was allegedly signed by Rebecca Thomas, PA-C. Prescription # 0594964 seized as evidence.
18. On June 5, 2019 Glant Eagle Pharmacy #0053 300 Tri-County Lane Belle Vernon, PA 15012 was visited in the attempt to recover forged prescriptions. Pharmacist Ashley Braum assisted by providing patient profiles on Marisa Magnelli.
19. Patient Profile showed that Marisa Magnelli purchased and received a prescription for Tylenol with Coedine #3- #60 on February 26, 2019. That prescription was allegedly signed by Ereny Eskarsun, M.D. Prescription # 4049196 seized as evidence.
20. On October 15, 2019 Donora Union Pharmacy 601 McKean Avenue Donora, PA 15033 was visited in the attempt to recover forged prescriptions. Pharmacist Chris assisted by providing patient profiles on Edward Bulko.
21. Patient Profile showed that Edward Bulko purchased and received a prescription for Hydrocodone 5-325mg #60 on January 5, 2018. That prescription was allegedly signed by Ereny Eskarous, M.D. Prescription # 02022274 seized as evidence.
22. Patient Profile showed that Edward Bulko purchased and received a prescription for Hydrocodone 10-325mg #60 on November 11, 2017. That prescription was allegedly signed by Allison Verenna, M.D. Prescription # 02021973 seized as evidence.
23. On August 19, 2019 at approximately 1300 hours, contact was made with Marisa Magnelli at her home of 104 Lynnwood Drive, Belle Vernon, Washington County. Kenneth Bitkowski was present.
24. Magnelli made admissions to forging prescriptions for Schedule II Controlled Substances starting in 2016 until she was terminated from Washington Health Systems in June of 2019.
25. When asked if she forged any prescriptions with anyone else's name, she replied that she forged prescriptions with her daughters, Lea and Erika Stover, her ex-boyfriend Edward Bulko, and her current husband Kenneth Bitkowski.
26. Magnelli stated that Lea and Erika Stover, Edward Bulko, Kenneth Bitkowski passed prescriptions and received narcotics knowing that the narcotics were for her.
27. Bitkowski stated that he knew the prescription with his name was a forgery.
28. In August 2019, Dr. Allison Verenna M.D., Dr. Ereny Eskarous, M.D., Rebecca Shaffer-Thomas, PA-C, Dr. Erin Shaffer, D.O., and Dr. Henry Folb, M.D. were providers identified by Washington Hospital's Clinical Connect software as being the names on the forged prescriptions.
29. Each provider was given a copy of the prescription printed out by Magnelli. Providers reviewed the prescription in an attempt to verify if they had written the prescriptions for the name provided. None of the forty-six (46) prescriptions shown to Verenna, Eskarous, Shaffer-Thomas, Shaffer, or Folb were signed by them. The persons listed on the prescriptions, Magnelli, Bitkowski, Bulko, or Erika Stover, have ever been patients of any the physicians/physician's assistants.
30. Erica Stover was interviewed on September 26, 2019. Stover made admissions to passing a prescription for narcotics in April 2019, knowing she did not acquire the prescription from a physician, at CVS Pharmacy. Stover stated Magnelli (mother) had given her the prescription and asked her to retrieve the prescription. Stover paid cash for the prescription and then gave the entire prescription to Magnelli.
31. Bulko was interviewed in September of 2019. Bulko made admissions to picking up and signing for prescriptions at pharmacies for Magnelli. Bulko stated he gave the entire prescription to Magnelli.
32. Marisa Magnelli to be charged with Title 18 Section 903(a)(1) Criminal Conspiracy (35 780-113a.12) (F)-3 counts, Title 18 Section 4101(a)(1) Forgery (F)-5 counts, Title 18 Section 4120 Identity Theft (M1)-5 counts, Title 35 Section 780-113(A)(12) Fraudulent Obtaining Controlled Substance (F)-2 counts.

WV POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name:	First: MARISA	Middle: P.	Last: MAGNELLI

AFFIDAVIT of PROBABLE CAUSE

I, NA ERIN P. KABLER, 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.

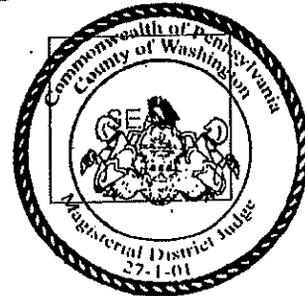
[Handwritten Signature] #40

(Signature of Affiant)

Sworn to me and subscribed before me this 21st day of October 2019

10/21/19 Date *[Handwritten Signature]*, Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WASHINGTON

Magisterial District Number: 27-1-01
MDJ: Hon. Robert W. Redlinger
Address: 90 Chestnut Street
Washington, PA 15301

Telephone: (724)228-6278



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

EDWARD

A.

BULKO

First Name

Middle Name

Last Name

Gen

981 Newell Street Fayette City, PA 15438

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 type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION				
Docket Number <u>CR 100-19</u>	Date Filed <u>07/31/2019</u>	OTN/LiveScan Number <u>U761305-6</u>	Complaint/Incident Number <u>BN5013019C</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>2/08/1959</u>	POB	Add'l DOB <u>1/1</u>	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name	Last Name	Gen.
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 type="checkbox"/> Non-Hispanic				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <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		5 9	

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. NC G 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, NA ERIN P. KABLER
(Name of the Affiant)

470

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

of Pennsylvania Office of Attorney General
(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

PA0222400

(Police Agency ORI Number)

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 [63003] City Of Washington
(Supervision Code) (Place/Political Subdivision)

In WASHINGTON County

[63]
(County Code)

on or about 2016 THROUGH 2019

POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 100-19</i>	Date Filed: <i>10/21/2019</i>	OTN/LiveScan Number: <i>027613056</i>	Complaint/Incident Number: <i>BN6013019C</i>
Defendant Name:	First: <i>EDWARD</i>	Middle:	Last: <i>BULKO</i>

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate:
 (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) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
<input checked="" type="checkbox"/> Lead?	<i>1</i>	<i>4101</i>	<i>A1</i>	<i>of the</i>	<i>18</i>	<i>2</i>	<i>F2</i>		
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:									
<p>18 4101A1 FORGERY F2 2 COUNTS</p> <p>The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 1 prescription for Hydrocodone (1-5-2018), of Ereny Eskarous M.D., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).</p> <p>The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 1 prescription for Hydrocodone (11-11-17), of Allison Verenna M.D., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).</p>									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
<input type="checkbox"/> Lead?	<i>2</i>	<i>4120</i>	<i>A</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F3</i>		
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:									
<p>18 4120A IDENTITY THEFT F3 1 COUNT</p> <p>The actor possessed or used, through any means, identifying information of another person, namely Allison Verenna, M.D., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).</p>									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
<input type="checkbox"/> Lead?	<i>3</i>	<i>903</i>	<i>(A)(1)</i>	<i>of the</i>	<i>18</i>	<i>1</i>	<i>F</i>		
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:									
<p>18 903(A)(1) CRIMINAL CONSPIRACY F 1 COUNT</p> <p>The actor, with the intent of promoting or facilitating the crime of 35: 780-113: A12 conspired and agreed with Marisa Magnelli that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime; and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).</p>									



POLICE CRIMINAL COMPLAINT

Docket Number: 02-000190	Date Filed: OCT 21 2019	OTN/LiveScan Number U 161305-6	Complaint/Incident Number BN5013019C
Defendant Name	First: EDWARD	Middle:	Last: BULKO

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
Lead?	4	780-113	A12	of the	35	2	F	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:									
35 780-113A12 PROHIBITED ACTS F 2 COUNTS The actor knowingly and intentionally acquired or obtained possession of Hydrocodone (1-5-2018), a controlled substance, from Donora Union Pharmacy by misrepresentation, fraud, forgery, deception or subterfuge, in violation of 35 P.S. §780-113(a) (12). The actor knowingly and intentionally acquired or obtained possession of Hydrocodone (11-11-17), a controlled substance, from Donora Union Pharmacy by misrepresentation, fraud, forgery, deception or subterfuge, in violation of 35 P.S. §780-113(a) (12).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
Lead?	5	4120	A	of the	18	1	M1	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 4120A IDENTITY THEFT M1 1 COUNT The actor possessed or used, through any means, identifying information of another person, namely Ereny Eskarous, M.D., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									

POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-10079</u>	Date Filed: <u>OCT 21 2019</u>	OTN/LiveScan Number <u>W 16/305-6</u>	Complaint/Incident Number <u>BN5013019C</u>
Defendant Name:	First: <u>EDWARD</u>	Middle: <u>A.</u>	Last: <u>BULKO</u>

- 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.)

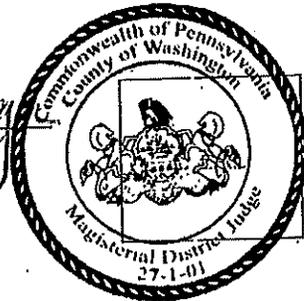
(Date)

[Signature] #470
 (Signature of Affiant)

AND NOW, on this date Oct. 21, 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.

27-101
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)



POLICE CRIMINAL COMPLAINT

Docket Number: C100019001	Date Filed: 10/21/2019	OTN/LiveScan Number: U 1613056	Complaint/Incident Number: BN5013018C
Defendant Name:	First: EDWARD	Middle:	Last: BULKO

1. Your Affiant, Erin P. Kabler, (hereinafter referred to as Kabler) is a narcotics agent employed by the Pennsylvania Attorney General, Bureau of Narcotics Investigation and Drug Control and is currently assigned to the Narcotics Division, Region V Office, North Huntingdon, PA. As such, I am empowered to conduct investigations into violations of various laws of the Commonwealth including PA Act 64 "Controlled Substance, Drug, Device and Cosmetic Act." During the course of such investigations, I am authorized to apply for, obtain and serve search warrants, make seizures and arrests.
2. Kabler has been a law enforcement officer since 2003. From 2003 to 2018, your affiant was employed by the City of Johnstown Police Department in Pennsylvania and was assigned to the Patrol Division. Your affiant held the rank of Patrol Sergeant. Kabler has received specific training in methods of drug law enforcement from the Pennsylvania Office of Attorney General, Pennsylvania State Police, the Cambria County Drug Task Force, Institute for Law Enforcement Education, PA DUI Association, Indiana University of Pennsylvania, and Desert Snow Drug Interdiction. Kabler is familiar with tactics used by narcotics traffickers to elude the efforts of law enforcement while participating in the sale, acquisition and misrepresentation of illegal and scheduled drugs. Kabler has personally participated in an excess of 200 narcotic investigations, which included utilizing confidential informants, and controlled purchase of narcotics.
3. In June of 2019, Director of Pharmacy Washington Health Systems, Jeremy Funkhouser reported that one Marisa Magnelli forged/altered prescription for controlled substances.
4. Marisa Magnelli was a former employee in the Washington Health System where she worked as a medical assistant. Magnelli was a "floater" meaning she would work in several physician's offices in Washington County.
5. Washington Health Systems participates in an information exchange with other health systems. The software, Clinical Connect, ties in all patient charts from every entity with in the Washington Health System. Clinical Connect has the capability to look at each date transaction and reference to an algorithm.
6. During routine audit, Information Systems noted that demographics were changed by the same Medical Assistant, Marisa Magnelli, on several prescriptions.
7. Initial audit by Denis Abraham, Manager of Ambulatory Systems, found twenty-eight (28) prescriptions forged/altered.
8. A more extensive audit revealed that Magnelli accessed patient records forty-six (46) in 2017 through 2019.
9. Audit tracked Magnelli accessing patient records and changing the demographics in order to print out prescriptions for controlled and non-controlled substances in her name as well as Edward Bulko (ex-boyfriend).
10. During the month of June 2019, Giant Eagle Pharmacies, Rite Aid Pharmacy, and CVS Pharmacy were visited after they were identified by PDMP as pharmacies where the identified prescriptions were passed.
11. On October 15, 2019 Donora Union Pharmacy 601 McKean Avenue Donora, PA 15033 was visited in the attempt to recover forged prescriptions. Pharmacist Chris assisted by providing patient profiles on Edward Bulko.
12. Patient Profile showed that Edward Bulko purchased and received a prescription for Hydrocodone 5-325mg #60 on January 5, 2018. That prescription was allegedly signed by Ereny Eskarous, M.D. Prescription # 02022274 seized as evidence.
13. Patient Profile showed that Edward Bulko purchased and received a prescription for Hydrocodone 10-325mg #60 on November 11, 2017. That prescription was allegedly signed by Allison Verenna, M.D. Prescription # 02021973 seized as evidence.
14. On August 19, 2019 at approximately 1300 hours, contact was made with Marisa Magnelli at her home of 104 Lynwood Drive, Belle Vernon, Washington County.
15. Magnelli made admissions to forging prescriptions for Schedule II Controlled Substances starting in 2016 until she was terminated from Washington Health Systems in June of 2019.
16. When asked if she forged any prescriptions with anyone else's name, she replied that she forged prescriptions for her



POLICE CRIMINAL COMPLAINT

Docket Number: 21600-1900	Date Filed: OCT 21 2019	OTN/LiveScan Number U16128526	Complaint/Incident Number BN5013019C
Defendant Name	First: EDWARD	Middle:	Last: BULKO

ex-boyfriend Edward Bulko

17. Magnelli stated that Edward Bulko passed prescriptions and received narcotics knowing that the narcotics were for her.
18. In August 2019, Dr. Allison Verenna M.D., Dr. Ereny Eskarous, M.D., Rebecca Shaffer-Thomas, PA-C, Dr. Erin Shaffer, D.O., and Dr. Henry Folb, M.D. were providers identified by Washington Hospital's Clinical Connect software as being the names on the forged prescriptions.
19. Each provider was given a copy of the prescription printed out by Magnelli. Providers reviewed the prescription in an attempt to verify if they had written the prescriptions for the name provided. None of the forty-six (46) prescriptions shown to Verenna, Eskarous, Shaffer-Thomas, Shaffer, or Folb were signed by them. The persons listed on the prescriptions Bulko has never been patient of any the physicians/physician's assistants.
20. Bulko was interviewed in September of 2019. Bulko made admissions to picking up and signing for prescriptions at pharmacies for Magnelli. Bulko stated he gave the entire prescription to Magnelli.
21. Edward Bulko to be charged with Title 18 Section 903(a)(1) Criminal Conspiracy (35 780-113a.12) (F), Title 18 Section 4101(a) (1) Forgery (F)-2 counts, Title 18 Section 4120 Identity Theft (M1)-2 counts, Title 35 Section 780-113(A)(12) Fraudulent Obtaining Controlled Substance (F)-2 counts.

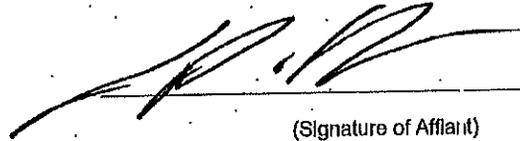
POLICE CRIMINAL COMPLAINT

Docket Number: 06-1005-19	Date Filed: 10/27/2019	OTN/LiveScan Number 11/11/16/15/16	Complaint/Incident Number BN5013019C
Defendant Name:	First: EDWARD	Middle: A.	Last: BULKO

AFFIDAVIT of PROBABLE CAUSE

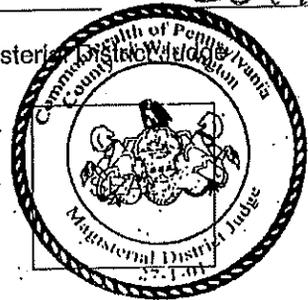
I, NA ERIN P. KABLER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.

 #470
(Signature of Affiant)

Sworn to me and subscribed before me this 21st day of October, 2019
16-29-19 Date Robertas Padlingas, Magisterial Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF WASHINGTON



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 27-1-01
MDJ: Hon. Robert W. Redlinger
Address: 90 Chestnut Street
Washington, PA 15301

DEFENDANT: (NAME and ADDRESS):
KENNETH J. BITKOWSKI
First Name Middle Name Last Name Gen
104 Lynnwood Avenue
Belle Vernon, PA 15012

Telephone: (724)228-6278

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 type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>OL 518-19</u>	Date Filed <u>OCT 21 2019</u>	OTN/LiveScan Number <u>12 161281-3</u>	Complaint/Incident Number <u>BN5013019C</u>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>09/21/1962</u>	POB	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input type="checkbox"/>			
First Name		Middle Name	Last Name	Gen.			
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 type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown							
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown)							
<input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)							
<input type="checkbox"/> BLN (Blonde / Strawberry)							
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray)							
<input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> OXX (Unknown)							
DNA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)				
FBI Number		MNU Number					
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT (in.)				
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. NC C 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) 11

I, ERIN P. KABLEK 470
(Name of the Affiant) (PSP/IMPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400
(Identify Department or Agency Represented and Political Subdivision) (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 [63003] City Of Washington
(Subdivision Code) (Place-Political Subdivision)

In WASHINGTON County [63] on or about 2016 THROUGH 2019
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN6013019C
Defendant Name	First: EDWARD	Middle:	Last: BITKOWSKI

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate:
 (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) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
X	1	4101	A1	of the	18	1	F2		
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 4101A1 FORGERY F2 1 COUNT The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 1 prescription for Hydrocodone (1-5-2018), of Ereny Eskarous M.D., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
	2	903	(A)(1)	of the	18	1	F		
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:									
18 903(A)(1) CRIMINAL CONSPIRACY F 1 COUNT The actor, with the intent of promoting or facilitating the crime of 35: 780-113: A12 conspired and agreed with Marisa Magnelli that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
	3	780-113	A12	of the	35	1	F		
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:									
35 780-113A12 PROHIBITED ACTS F 1 COUNT The actor knowingly and intentionally acquired or obtained possession of Hydrocodone (5-10-2019), a controlled substance, from CVS Pharmacy #4077 by misrepresentation, fraud, forgery, deception or subterfuge, in violation of 35 P.S. §780-113(a) (12).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number:	Complaint/Incident Number: BN5013019C
Defendant Name	First: EDWARD	Middle:	Last: BITKOWSKI

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
Lead?	4	4120	A	of the	18	1	M1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense: 18 4120A IDENTITY THEFT M1 1 COUNT The actor possessed or used, through any means, identifying information of another person, namely Ereny Eskarous, M.D., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S. §4120(a).									



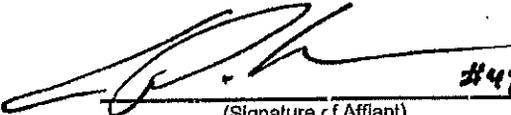
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name:	First: KENNETH	Middle: J.	Last: BITKOWSKI

- 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.)**

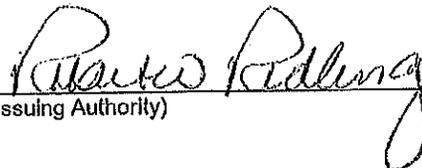
(Date)

 #476
(Signature of Affiant)

AND NOW, on this date Oct. 21, 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.

27-101
(Magisterial District Court Number)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name	First: EDWARD	Middle:	Last: BITKOWSKI

1. Your Affiant, Erin P. Kabler, (hereinafter referred to as Kabler) is a narcotics agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control and is currently assigned to the Narcotics Division, Region V Office, North Huntingdon, PA. As such, I am empowered to conduct investigations into violations of various laws of the Commonwealth including PA Act 64 "Controlled Substance, Drug, Device and Cosmetic Act." During the course of such investigations, I am authorized to apply for, obtain and serve search warrants, make seizures and arrests.

2. Kabler has been a law enforcement officer since 2003. From 2003 to 2018, your affiant was employed by the City of Johnstown Police Department in Pennsylvania and was assigned to the Patrol Division. Your affiant held the rank of Patrol Sergeant. Kabler has received specific training in methods of drug law enforcement from the Pennsylvania Office of Attorney General, Pennsylvania State Police, the Cambria County Drug Task Force, Institute for Law Enforcement Education, PA, DUI Association, Indiana University of Pennsylvania, and Desert Snow Drug Interdiction. Kabler is familiar with tactics used by narcotics traffickers to elude the efforts of law enforcement while participating in the sale, acquisition and misrepresentation of illegal and scheduled drugs. Kabler has personally participated in an excess of 200 narcotic investigations, which included utilizing confidential informants, and controlled purchase of narcotics.

3. In June of 2019, Director of Pharmacy Washington Health Systems, Jeremy Funkhouser reported that one Marisa Magnelli forged/altered prescription for controlled substances.

4. Marisa Magnelli was a former employee in the Washington Health System where she worked as a medical assistant. Magnelli was a "floater" meaning she would work in several physician's offices in Washington County.

5. Washington Health Systems participates in an information exchange with other health systems. The software, Clinical Connect, ties in all patient charts from every entity within the Washington Health System. Clinical Connect has the capability to look at each date transaction and reference to an algorithm.

6. During routine audit, Information Systems noted that demographics were changed by the same Medical Assistant, Marisa Magnelli, on several prescriptions.

7. Initial audit by Denis Abraham, Manager of Ambulatory Systems, found twenty-eight (28) prescriptions forged/alters.

8. A more extensive audit revealed that Magnelli accessed forty-six (46) patient records in 2017 through 2019.

9. The audit tracked Magnelli accessing patient records and changing the demographics in order to print out prescriptions for controlled and non-controlled substances in her name as well as Edward Bulko (ex-boyfriend).

10. During the month of June 2019, Giant Eagle Pharmacies, Rite Aid Pharmacy, and CVS Pharmacy were visited after they were identified by PDMP as pharmacies where the identified prescriptions were passed.

11. On October 15, 2019 Donora Union Pharmacy 601 McKean Avenue Donora, PA 15033 was visited in the attempt to recover forged prescriptions. Pharmacist Chris assisted by providing patient profiles on Edward Bulko.

12. Patient Profile showed that Edward Bulko purchased and received a prescription for Hydrocodone 5-325mg #60 on January 5, 2018. That prescription was allegedly signed by Ereny Eskarous, M.D. Prescription # 02022274 seized as evidence.

13. Patient Profile showed that Edward Bulko purchased and received a prescription for Hydrocodone-10-325mg #60 on November 11, 2017. That prescription was allegedly signed by Allison Verenna, M.D. Prescription # 02021973 seized as evidence.

14. On August 19, 2019 at approximately 1300 hours, contact was made with Marisa Magnelli at her home of 104 Lynnwood Drive, Belle Vernon, Washington County.

15. Magnelli made admissions to forging prescriptions for Schedule II Controlled Substances starting in 2016 until she was terminated from Washington Health Systems in June of 2019.

16. When asked if she forged any prescriptions with anyone else's name, she replied that she forged prescriptions for her



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name	First: EDWARD	Middle:	Last: BITKOWSKI

ex-boyfriend Edward Bulko

17. Magnelli stated that Edward Bulko passed prescriptions and received narcotics knowing that the narcotics were for her.

18. In August 2019, Dr. Allison Verenna M.D., Dr. Ereny Eskarous, M.D., Rebecca Shaffer-Thomas, PA-C, Dr. Erin Shaffer, D.O., and Dr. Henry Folb, M.D. were providers identified by Washington Hospital's Clinical Connect software as being the names on the forged prescriptions.

19. Each provider was given a copy of the prescription printed out by Magnelli. Providers reviewed the prescription in an attempt to verify if they had written the prescriptions for the name provided. None of the forty-six (46) prescriptions shown to Verenna, Eskarous, Shaffer-Thomas, Shaffer, or Folb were signed by them. The persons listed on the prescriptions Bulko has never been patient of any the physicians/physicians assistants.

20. Bulko was interviewed in September of 2019. Bulko made admissions to picking up and signing for prescriptions at pharmacies for Magnelli. Bulko stated he gave the entire prescription to Magnelli.

21. Edward Bulko to be charged with Title 18 Section 903(a)(1) Criminal Conspiracy (35 780-113a.12) (F), Title 18 Section 4101(a) (1) Forgery (F)-1 counts, Title 18 Section 4120 Identity Theft (M1)-1 counts, Title 35 Section 780-113(A)(12) Fraudulent Obtaining Controlled Substance (F)-1 counts.



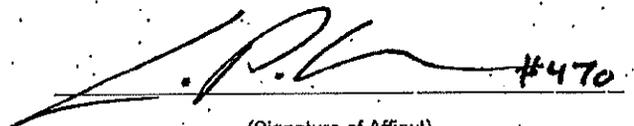
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name:	First: KENNETH	Middle: J.	Last: BITKOWSKI

AFFIDAVIT of PROBABLE CAUSE

I, , 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.

 #470
(Signature of Affiant)

Sworn to me and subscribed before me this 21st day of October, 2019

10/21/19 Date Robert W Redding



My commission expires first Monday of January, 2022

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: WASHINGTON

Magisterial District Number: 27-1-01
MDJ: Hon. Robert W. Redlinger
Address: 90 Chestnut Street
Washington, PA 15301

Telephone: (724)228-6278



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

ERIKA

A.

STOVER

First Name

Middle Name

Last Name

Gen

1111 Lewis Street, Brownsville, PA 15417

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 type="checkbox"/> 4-Felony No Extradition	<input type="checkbox"/> B-Misdemeanor Limited	<input type="checkbox"/> F-Misdemeanor Pending Extradition	

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>OL 599-19</u>	Date Filed <u>Oct 21 2019</u>	OTN/LiveScan Number <u>U 761287-4</u>	Complaint/Incident Number <u>BN5013019C</u>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB <u>7/10/1992</u>	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name	Last Name	Gen.
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 type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubrn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown)				
<input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)				
<input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray)				
<input checked="" type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> :XX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:				5 5

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Com'n'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NC C 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, NA ERIN P. KABLER

470

(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 [63003] City Of Washington
(Subdivision Code) (Place-Political Subdivision)

In WASHINGTON County [63] on or about 2016 THROUGH 2019
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name	First:	Middle:	Last:

The acts committed by the accused are described below with each Act of Assembly or statute violated, if appropriate:
 (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) violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
X	1	4101	A1	of the	18	1	F2		
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 4101A1 FORGERY F2 1 COUNT The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, altered a writing, namely 1 prescription for Schedule II Controlled Substance (4-26-19), of Rebecca Thomas, PA-C., who did not authorize the alteration, in violation 18 Pa. C.S. §4101(a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
	2	903	(A)(1)	of the	18	1	F		
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:									
18 903(A)(1) CRIMINAL CONSPIRACY F 1 COUNT The actor, with the intent of promoting or facilitating the crime of 35: 780-113: A12 conspired and agreed with Marisa Magmelli that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A		
	3	780-113	A12	of the	35	1	F		
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:									
35 780-113A12 PROHIBITED ACTS F 1 COUNT The actor knowingly and intentionally acquired or obtained possession of Hydrocodone (4-26-19), a controlled substance, from CVS Pharmacy #4077 by misrepresentation, fraud, forgery, deception or subterfuge, in violation of 35 P.S. §780-113(a) (12).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN50130190
Defendant Name	First:	Middle:	Last:

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	<input type="checkbox"/> A1 (Engaging)	<input type="checkbox"/> A2 (Aiding)	<input type="checkbox"/> B (Knowledge)	<input type="checkbox"/> Permitting (Title 75 Only) 75 1575 A
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Lead?	4	4120	A	of the	18	1	M1	NCIC Offense Code	UCR/NIBRS Code
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade				

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

18 4120A IDENTITY THEFT M1 1 COUNT

The actor possessed or used, through any means, identifying information of another person, namely Rebecca Thomas, PA-C., without the consent of that other person in furtherance of an unlawful purpose, in violation of 18 Pa.C.S.§4120(a).

POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name:	First: ERIKA	Middle: A.	Last: STOVER

- 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.

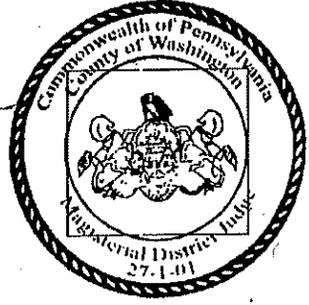
The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

_____ (Date)
 _____ (Signature of Affiant) # 470

AND NOW, on this date Oct. 21, 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.

27-101
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name	First:	Middle:	Last:

1. Your Affiant, Erin P. Kabler, (hereinafter referred to as Kabler) is a narcotics agent employed by the Pennsylvania Office of Attorney General, Bureau of Narcotics Investigation and Drug Control and is currently assigned to the Narcotics Division, Region V Office, North Huntingdon, PA. As such, I am empowered to conduct investigations into violations of various laws of the Commonwealth including PA Act 64 "Controlled Substance, Drug, Device and Cosmetic Act." During the course of such investigations, I am authorized to apply for, obtain and serve search warrants, make seizures and arrests.

2. Kabler has been a law enforcement officer since 2003. From 2003 to 2018, your affiant was employed by the City of Johnstown Police Department in Pennsylvania and was assigned to the Patrol Division. Your affiant held the rank of Patrol Sergeant. Kabler has received specific training in methods of drug law enforcement from the Pennsylvania Office of Attorney General, Pennsylvania State Police, the Cambria County Drug Task Force, Institute for Law Enforcement Education, PA. DUI Association, Indiana University of Pennsylvania, and Desert Snow Drug Interdiction. Kabler is familiar with tactics used by narcotics traffickers to elude the efforts of law enforcement while participating in the sale, acquisition and misrepresentation of illegal and scheduled drugs. Kabler has personally participated in an excess of 200 narcotic investigations, which included utilizing confidential informants, and controlled purchase of narcotics.

3. In June of 2019, Director of Pharmacy Washington Health Systems, Jeremy Funkhouser reported that one Marisa Magnelli forged/alters prescription for controlled substances.

4. Marisa Magnelli was a former employee in the Washington Health System where she worked as a medical assistant. Magnelli was a "floater" meaning she would work in several physician's offices in Washington County.

5. Washington Health Systems participates in an information exchange with other health systems. The software, Clinical Connect, ties in all patient charts from every entity within the Washington Health System. Clinical Connect has the capability to look at each date transaction and reference to an algorithm.

6. During routine audit, information systems noted that demographics were changed by the same Medical Assistant, Marisa Magnelli, on several prescriptions.

7. Initial audit by Denis Abraham, Manager of Ambulatory Systems, found twenty-eight (28) prescriptions forged/alters.

8. A more extensive audit revealed that Magnelli accessed patient records forty-six (46) in 2017 through 2019.

9. Audit tracked Magnelli accessing patient records and changing the demographics in order to print out prescriptions for controlled and non-controlled substances in her name as well as Erika Stover (daughter), Edward Bulko (ex-boyfriend) and Kenneth Bitkowski (husband).

10. During the month of June 2019, Giant Eagle Pharmacies, Rite Aid Pharmacy, and CVS Pharmacy were visited after they were identified by PDMP as pharmacies where the identified prescriptions were passed.

11. On June 5, 2019 CVS Pharmacy #4077 975 Rostraver Road Belle Vernon, PA 15012 was visited in the attempt to recover forged prescriptions. Pharmacist Laurie Climes assisted by providing patient profiles on Erika Stover and Kenneth Bitkowski.

12. Patient Profile showed that Erika Stover purchased and received a prescription for Hydrocodone 7.5-325mg #60 on April 27, 2019. That prescription was allegedly signed by Rebecca Thomas, PA-C. Prescription #1470639 seized as evidence.

13. On June 5, 2019 Rite Aid Pharmacy #10891 Belle Vernon, PA 15012 was visited in the attempt to recover forged prescriptions. Pharmacist assisted by providing patient profiles on Erika Stover and Marisa Magnelli.

14. Patient Profile showed that Erika Stover purchased and received a prescription for Oxycodone 10mg #90 on April 27, 2019. That prescription was allegedly signed by Rebecca Thomas, PA-C. Prescription # 0596895 seized as evidence.

15. On August 19, 2019 at approximately 1300 hours, contact was made with Marisa Magnelli at her home of 104 Lynnwood Drive, Belle Vernon, Washington County.

16. Magnelli made admissions to forging prescriptions for Schedule II Controlled Substances starting in 2016 until she was



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name	First:	Middle:	Last:

terminated from Washington Health Systems in June of 2019.

17. When asked if she forged any prescriptions with anyone else's name, she replied that she forged prescriptions with her daughters Erika Stover.

18. Magnelli stated that Erika Stover passed prescriptions and received narcotics knowing that the narcotics were for her (Magnelli).

19. In August 2019, Dr. Allison Verenna M.D., Dr. Ereny Eskarous, M.D., Rebecca Shaffer-Thomas, PA-C, Dr. Erin Shaffer, D.O., and Dr. Henry Folb, M.D. were providers identified by Washington Hospital's Clinical Connect software as being the names on the forged prescriptions.

20. Each provider was given a copy of the prescription printed out by Magnelli. Providers reviewed the prescription in an attempt to verify if they had written the prescriptions for the name provided. None of the forty-six (46) prescriptions shown to Verenna, Eskarous, Shaffer-Thomas, Shaffer, or Folb were signed by them. Erika Stover, has never been patients of any the physicians/physician's assistants.

21. Erica Stover was interviewed on September 26, 2019. Stover made admissions to passing a prescription for narcotics in April 2019, knowing she did not acquire the prescription from a physician, at CVS Pharmacy. Stover stated Magnelli (mother) had given her the prescription and asked her to retrieve the prescription. Stover paid cash for the prescription and then gave the entire prescription to Magnelli.

22. Erika Stover to be charged with Title 18 Section 903(a)(1) Criminal Conspiracy (35 780-113a.12) (F), Title 18 Section 4101(a) (1) Forgery (F)-1 counts, Title 18 Section 4120 Identity Theft (M1)-1 counts, Title 36 Section 780-113(A)(12) Fraudulent Obtaining Controlled Substance (F)-1 counts.

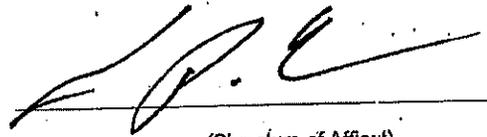
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number BN5013019C
Defendant Name:	First: ERIKA	Middle: A.	Last: STOVER

AFFIDAVIT of PROBABLE CAUSE

I, NA ERIN P. KABLER, 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.

 #470
(Signature of Affiant)

Sworn to me and subscribed before me this 21st day of October, 2019

10/21/19 Date Roberto Redding

Magister District #470

My commission expires first Monday of January, 2022

