

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: PHILADELPHIA

Magisterial District Number:  
MDJ: Hon. Phila. Arraignment Court  
Address: Criminal Justice Center  
Philadelphia, PA 19107

Telephone: (215)683-7283



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

(NAME and ADDRESS):

MOVITA

RENEE

JOHNSON

First Name

Middle Name

Last Name

Ge  
n

4927 Parkside Avenue  
Philadelphia, PA 19131

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	Date Filed <b>12/4/19</b>	OTN/LiveScan Number	Complaint/Incident Number <b>19-09-051017 36-714</b>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 04/21/1966	POB Pennsylvania	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>

First Name	Middle Name	Last Name	Gen.
AKA			

RACE ☐ White ☐ Asian ☒ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☐ Non-Hispanic ☒ Unknown

Hair Color  
☐ GRY (Gray) ☐ RED (Red/Aubn) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown)  
☒ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Pink)  
☐ BLN (Blonde / Strawberry)

Eye Color  
☐ BLK (Black) ☐ BLU (Blue) ☒ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray)  
☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)

DNA ☐ YES ☐ NO DNA Location WEIGHT (lbs.)

FBI Number MNU Number

Defendant Fingerprinted ☐ YES ☒ NO Ft. HEIGHT In.

Fingerprint Classification: 5 6

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because: \_\_\_\_\_

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

SDAG KIRK HANDRICH

(Name of the attorney for the Commonwealth)

*Kirk Handrich*

(Signature of the attorney for the Commonwealth)

12/04/2019

(Date)

I, SEAN M. MCGLINN

(Name of the Affiant)

#572

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

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [ ] (Subdivision Code) (Place-Political Subdivision)

in PHILADELPHIA County [51]

(County Code)

on or about 2015 - PRESENT



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <b>12/4/19</b>	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

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 checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	--	---	---	---

<input checked="" type="checkbox"/>	1	3921	(a)	of the	18 PA. C.S.	1	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **THEFT BY UNLAWFUL TAKING OR DISPOSITION**

Acts of the accused associated with this Offense: A person commits an offense if he/she unlawfully takes, or exercises unlawful control over, moveable property of another with intent to deprive him/her thereof. TO WIT: The defendant did, in 2017 and 2018, transfer from and write checks against the bank accounts of her non-profit charitable organization, MECA, for personal expenditures, including fraudulent real estate payments, clothing, trips, and other expenses, with the amount involved being in excess of \$2,000.

<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 _____
---	--	---	---	---

<input type="checkbox"/>	2	3921	(a)	of the	18 PA. C.S.	1	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **THEFT BY UNLAWFUL TAKING OR DISPOSITION**

Acts of the accused associated with this Offense: A person commits an offense if he/she unlawfully takes, or exercises unlawful control over, moveable property of another with intent to deprive him/her thereof. TO WIT: The defendant did, in late 2015 and early 2016, transfer from and write checks against the bank accounts of her non-profit charitable organization, MECA, to make fraudulent political contributions to her campaign for state representative, with the amount involved being in excess of \$2,000.

<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 _____
---	--	---	---	---

<input type="checkbox"/>	3	3922	(a)(1)	of the	18 PA.C.S.A.	1	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: A person commits an offense if he/she intentionally obtains or withholds property of another by deception. A person deceives if he/she intentionally creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind: but deception as to a person's intention to perform a promise shall not be inferred from the fact alone that he/she did not subsequently perform the promise. TO WIT: The defendant, acting as a principal or an accomplice, obtained a mortgage for a home located at 4927 Parkside Avenue, Philadelphia by falsely claiming that a relative was purchasing the home, when the defendant would be the actual resident and would be paying the mortgage, and by creating and submitting fraudulent MECA pay stubs that listed an inflated salary for the relative whose name the mortgage would be in, with the amount involved being in excess of \$2,000.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <b>12/4/19</b>	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

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 _____
------------------	--	---	---	---

<input type="checkbox"/>	4	4902	(a)	of the	18 PA. C.S.	1	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **PERJURY**

Acts of the accused associated with this Offense: A person commits an offense if in any official proceeding he/she makes a false statement under oath or equivalent affirmation, or swears or affirms the truth of a statement previously made, when the statement is material and he/she does not believe it to be true. TO WIT: The defendant made materially false statements under oath during federal bankruptcy proceedings concerning her ownership of three properties, her possession of treasurer checks in the amount of \$45,000 and \$40,000, and her relationship with the potential buyer of her Powelton Avenue property.

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 _____
------------------	--	---	---	---

<input type="checkbox"/>	5	4911	(a)(2)	of the	18 PA. C.S.	1	M2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: A person commits an offense if he/she makes a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; makes presents or uses any record, document or thing knowing it to be false, and with intent that it be taken as a genuine part of information or records. TO WIT: The defendant made false entries on her 2017 Pennsylvania personal income tax return, which was filed with the Pennsylvania Department of Revenue, by over-reporting expenses such as taxes, mortgage interest, and rental expenses, thereby, reducing her tax liability.

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 _____
------------------	--	---	---	---

<input type="checkbox"/>	6	4911	(a)(2)	of the	18 PA. C.S.	1	M2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
---------------------------------	--------------------	--	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: A person commits an offense if he/she makes a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government; makes presents or uses any record, document or thing knowing it to be false, and with intent that it be taken as a genuine part of information or records. TO WIT: The defendant made a false entry on the 2017 Form 990, filed with the Internal Revenue Service for MECA, the defendant's charitable non-profit organization, by falsely claiming that MECA had incurred over \$60,000 in maintenance/repair that never took place, thereby, concealing how those funds had actually been used.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <b>12/4/19</b>	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

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 _____
------------------	--	---	---	---

<input type="checkbox"/>	7	1109	(b)	of the	65 PA C.S.	1	M		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **STATEMENTS OF FINANCIAL INTERESTS**

Acts of the accused associated with this Offense: A person commits an offense if he/she fails to provide information requested on a Statement of Financial Interest, filed pursuant to the Public Official and Employee Ethics Act on a form prescribed by the State Ethics Commission, to the best of the knowledge, information and belief of the person required to file. TO WIT: On April 30, 2018, and January 28, 2019, the defendant filed an erroneous Statements of Financial Interest failing to disclose her income from or position in MECA as well as her many creditors. On May 1, 2019, the defendant filed a third Statement of Financial interest failing to disclose many of her creditors.

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 _____
------------------	--	---	---	---

<input type="checkbox"/>	8	3550		of the	25 P.S.	1	M		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **REPORTING BY CANDIDATE AND POLITICAL COMMITTEES AND OTHER PERSON**

Acts of the accused associated with this Offense: A person commits an offense if a candidate for for election to public office or a political committee fails to properly file with the appropriate supervisor reports of receipts and expenditures on forms, designed by the Secretary of the Commonwealth. TO WIT: The defendant failed to properly report the amount of her 2019 campaign's receipts and expenditures to the Pennsylvania Department of State.

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 _____
------------------	--	---	---	---

<input type="checkbox"/>				of the					
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <u>12/4/19</u>	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

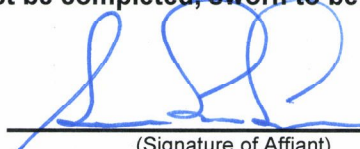
2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties 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 1.
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)

(Year)

 \*S72  
(Signature of Affiant)

AND NOW, on this date \_\_\_\_\_ I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

\_\_\_\_\_  
(Magisterial District Court Number)

  
\_\_\_\_\_  
(Issuing Authority)

SEAL



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 12/4/19	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

## AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Sean M. McGlinn, Supervisory Special Agent, Badge 572, of the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations assigned to the Criminal Prosecutions Section, being duly sworn according to law, deposes and says:

Your Affiant is empowered by law to conduct investigations of and to make arrests for violations of the Pennsylvania Crimes Code and the Pennsylvania Election Code, among other things.

Before her election to public office, Movita Johnson-Harrell, the defendant, established a non-profit charitable organization, Motivations Education & Consultation Associates (MECA). MECA's purpose was to serve the mentally ill and drug-addicted poor. This investigation has revealed, however, that the charitable organization functioned in large part as a means for the defendant to enrich herself. For years, she stole from the organization, converting charitable funding into investment properties, vacations, and luxury clothing, including a set of matching fur coats (fox) for herself and her husband. The thefts continued even after defendant's appointment to a high-level position in the Philadelphia District Attorney's Office and her election to the Pennsylvania House of Representatives. Despite illegal infusions of cash, the defendant amassed large debts, including delinquent mortgage payments, utility bills, and the auto loan payments for her Porsche Cayenne.

MECA's bank account records, Johnson's personal bank accounts records, and her campaign account records reveal that, from at least December 2015 to the present, Johnson repeatedly mischaracterized financial transactions in order to accomplish this theft scheme. The concealed transactions then served as the basis for false representations in Johnson's personal tax returns filed in the Commonwealth of Pennsylvania, MECA's Form 990 tax report filed with the Internal Revenue Service (IRS), and Johnson's campaign finance reports filed with the Pennsylvania Department of State.

The defendant purchased 4066, 4068 and 4070 Powelton Avenue, Philadelphia (collectively the Powelton property) on July 6, 2005 for \$560,000. The investigation revealed a deed and mortgage reflecting that the owners agreed to sell the property through a loan requiring Johnson to make mortgage payments of \$3,345 a month. In July 2013, Johnson, as director of MECA, decided to rent the property from herself in order to operate a personal care home. The "rent" payment was exactly the amount of Johnson's personal mortgage: \$3,345 a month.

Eventually, the defendant was forced to close the property after the Pennsylvania Department of Human Services threatened to shut down the home due to uninhabitable conditions. DHS officials described the condition of the home as "squalor." To avoid legal action, MECA abruptly closed the facility, forcing its residents to move to other homes.

After the Powelton home was closed down, Johnson continued to pay herself "rent" for the unused property. In her position in charge of MECA, and in her personal capacity as owner of the property, Johnson knew that the charitable organization was no longer using the Powelton facility. Even after all the occupants were all moved out, however, Johnson continued to write herself monthly "rent" checks (at \$3,345 a month) from MECA's bank account – for a charitable facility that no longer existed.

Until July of 2016, Johnson lived with her family at 59 Price Avenue in Lansdowne, Pennsylvania. Johnson and the family then moved to a house at 4927 Parkside Avenue in West Philadelphia. Due to Johnson's clouded credit history, that property was purchased not in Johnson's name, but in a relative's name, although the relative did not live there and Johnson was to be responsible for paying the mortgage.

Johnson used MECA to create fraudulent records that would support a mortgage she could not otherwise have obtained. The investigation revealed the mortgage application filed in the name of Johnson's relative. The application consisted of inaccurate and inflated income statements reflecting that Johnson's relative made \$13,000 a month – working for MECA. The paystubs, covering two-week periods in May and June 2016, indicated that the relative's hourly rate was \$75, her gross bi-weekly income was \$6,000, and her year-to-date earnings were \$84,000. None of that was true. Pennsylvania tax records revealed that Johnson's relative actually made only \$31,080 in all of 2016. Based on this fraudulent information, Johnson obtained a mortgage for over \$200,000 for the Parkside home.

In addition to these ongoing real estate frauds, Johnson continued to use MECA funds for her own purposes throughout 2017. On April 10, for example, Johnson made out a MECA check to "Cash" for \$3,150 and deposited it into her personal bank account. At the time, her own account had a balance of \$67. Within two days of the MECA cash infusion, Johnson spent \$840.06 at a designer clothing website she frequented and bought an airline ticket for \$292.40. She also wrote a \$1,500 check to a criminal defense attorney to represent a relative, who had been recently arrested.

Later in April 2017, Johnson took a \$2,000 payment due to MECA from one of its business partners and deposited it into her personal bank account, followed by another MECA check made out to "Cash" on May 1 in the amount of for \$1,250. That same day, she made two remittances, \$826.38 and \$1,239.57, for past due car payments on her Porsche. Two days later, and two weeks before the primary election for Philadelphia District Attorney, Johnson made a \$500 contribution to District Attorney candidate Joe Khan. On May 15, one day before the primary, and after depositing more MECA money into her personal account, Johnson contributed \$500 to "Krasner for DA."



# POLICE CRIMINAL COMPLAINT

<b>Docket Number:</b>	<b>Date Filed:</b> 12/1/17	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> 36-714
<b>Defendant Name:</b>	<b>First:</b> MOVITA	<b>Middle:</b> RENEE	<b>Last:</b> JOHNSON HARRELL

In August 2017, after transferring more money from one of the MECA accounts into her personal bank account, Johnson paid her relative's criminal defense attorney another \$1,000. In late September, Johnson deposited into her personal account another MECA check for \$1,250 made out to "Cash," along with fraudulent "rent" checks for the Tioga property. A few days later, she paid an additional \$1,500 to her relative's attorney.

On October 31, 2017, a week before the general election, Johnson replenished her personal bank account with another \$2,500 transfer from MECA. She then wrote a \$2,000 check to "Krasner for DA."

Before the month of November ended, and with her balance down to \$83.56, Johnson also transferred \$5,000 from MECA's payroll account into her personal bank account, and then promptly paid a \$3,830 tuition bill for her grandchildren's private school. On a half dozen occasions, she purchased designer clothing and accessories from the "Vestiaire Collective," debited directly against the MECA account. There were additional MECA debits, totaling \$2,976.29, for purchases from Tradesy, another designer woman's clothing and accessories website, as well as Ralph Lauren and Macy's.

Starting at the end of November, prior to taking a position in the Philadelphia District Attorney's Office, Johnson appropriated another \$29,694 from MECA accounts and also transferred in \$2,500 from a relative's bank account, which she alone controlled. On December 19, 2017, Johnson wrote a check for \$3,200 to PGW for past due gas bills and two checks to the City of Philadelphia, one for \$3,202.83 for "taxes" and the second for \$1,538.37 for "business taxes." She also wrote a check for \$7,979.54 to satisfy her restitution from a 2014 criminal conviction for failure to pay unemployment compensation tax. Two weeks later, she was an employee of the City of Philadelphia.

Further, in 2017, Johnson used MECA funds to pay for vacations for her and her family. Johnson and family members visited Atlanta in April, Mexico in July and (a second time) in November, and Ocean City, Maryland in August. Johnson's Facebook posts from these vacation destinations leave no doubt that these were pleasure trips.

In April, 2017, there were MECA account debits for Johnson and her family at the Hilton Hotel Atlanta. In July, Johnson and a relative took a two-week vacation to Mexico. MECA account debits paid \$1,125.66 for two plane tickets, \$6,000 to Vida Vacations for her resort stay, and sundry expenses at The Grand Mayan Hotel in Acapulco. Then in August, Johnson deposited a \$1,400 check from MECA made out to "cash," with a note on the memo line that said "petty cash" into her personal bank account. A week later, she took the family to Ocean City, Maryland, using the cash she obtained from MECA. In November, Johnson and a relative took a second trip to Mexico. Once again, Johnson used MECA's operations account to pay the \$6,800 resort bill to Vida Vacations. Altogether, in just one year, Johnson spent over \$16,000 of MECA's money on vacations.

Throughout 2018, Johnson continued to transfer MECA money to her personal bank account using her existing methods. But she also used a new method, in which she used MECA to "repay" herself a fake "loan," that netted her tens of thousands on top of the more routine thefts.

In June 2018, Johnson deposited several checks, totaling over \$20,000, all drawn on MECA's accounts, into a relative's bank account that she controlled. Johnson then used the account to pay off a \$2,000 gas bill and sent \$3,000 to the IRS for back taxes. In August, she wrote herself a \$7,000 check to pay off an overdue water bill. In addition to these repayments, Johnson continued use MECA funds for her own purchases – she once again bought clothing – almost \$4,000 worth in 2018 – by paying directly from MECA accounts to retailers including Vestiaire, Tradesy, and The Real Real.

Bank statements reflect her use of MECA funds to pay \$3,000 of travel expenses (plane tickets, hotel accommodations and restaurants) for a family trip to Orlando, Florida, which Johnson bragged about on Facebook.

These various 2018 expenses, as during the previous year, were in addition to the money that Johnson routinely moved from MECA accounts to her personal bank account.

Although she was receiving bi-weekly salary checks for \$2,600 from the City of Philadelphia, and was stealing thousands from MECA's bank accounts, Johnson could not maintain the payments on her real estate portfolio. In January, she stopped paying the mortgage for her residence on Parkside Avenue. After six months in default, the mortgage company filed for foreclosure – not against Johnson herself, but against her relative named on the mortgage. She also went into default on another property located at 6006 Elmwood Avenue. By July, she was over \$10,000 in arrears on the Elmwood property.

MECA's prior non-profit tax forms had indicated a "loan" of \$70,000. Johnson's accountant, who prepared the forms, told investigators that this was not a real loan, but simply a way of expressing a budgetary deficit for accounting purposes. The accountant stated that she did not believe Johnson had ever made a loan to MECA.



## POLICE CRIMINAL COMPLAINT

<b>Docket Number:</b>	<b>Date Filed:</b> 12/4/19	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> 36-714
<b>Defendant Name:</b>	<b>First:</b> MOVITA	<b>Middle:</b> RENEE	<b>Last:</b> JOHNSON HARRELL

In late July and early August 2018, Johnson deposited two checks from MECA's bank account, for \$35,000 each, as purported "repayment" of the "loan" into her personal account. On July 30, 2018, she sent over \$12,000 to the mortgage company for the Elmwood property. By August 3, 2018, she was able to pay \$18,000 against the debt on her Parkside Avenue residence, and moved to dismiss the foreclosure action.

On November 6, 2018, Johnson filed a Chapter 13 petition for bankruptcy in the United State District Court for the Eastern District of Pennsylvania. The bankruptcy process required Johnson to file two statements - Forms 106 and 107 - documenting her assets and income. Johnson filed the necessary forms in December 2018, under penalty of perjury. Despite this warning, Johnson made several material misrepresentations on these forms.

On Form 106, for example, Johnson acknowledged her ownership of the Powelton property, but she failed to disclose her ownership interest in 2105 West Tioga Street, 605 North 52nd Street, the Elmwood Avenue property, or her Parkside home. Regarding her income, Johnson listed her nearly \$100,000 income from her job in the Philadelphia District Attorney's Office, but she failed to mention any income from MECA, including the "rent" payments she had been receiving. Johnson also inflated her expenses. On Form 107, Johnson failed to disclose that she was an officer, director, or managing executive of a corporation, when she alone had been running MECA.

Shortly after entering bankruptcy, Johnson began moving large sums of money around, converting much of it into bank checks in sums of tens of thousands of dollars. As a result, this money was readily available to Johnson, but not visible in current bank statements. She did not mention the bank checks, the largest of which was \$40,000, to the court. Nor did Johnson mention certain purchases she made just days after filing her bankruptcy forms. Johnson had affirmed, under penalty of perjury, that her limited income and basic living expenses left her only a little over a thousand dollars a month to pay toward her extensive debts. However, in December 2018, Johnson bought two fox fur coats from the Pollack Furs store. The cost was \$2,000. Three weeks later, Johnson went back and bought two more fox coats, this time for \$3,500.

Johnson had a hearing in bankruptcy court in late January 2019, at which she made more materially false statements under oath. Investigators obtained an audio recording of the hearing. Johnson falsely stated, under oath, that all the assertions in her bankruptcy forms were correct. She also falsely claimed that her salary had not changed since those filings. In fact, City of Philadelphia payroll records showed that on her one-year anniversary, January 2, 2019, the District Attorney had given her a 9% pay raise, from \$96,105 to \$104,805.

Especially notable, however, were Johnson's statements at the hearing regarding the three-parcel Powelton Avenue property she owned. Johnson testified that she had an agreement to sell the property to a buyer for \$595,000, as evidence of her good faith efforts to satisfy her debts. When asked how she knew the buyer, Johnson responded "I don't." Johnson testified that the sale was imminent, dependent only on approval for financing by the buyer's bank expected later that same day. Johnson's representations were false. Investigators discovered that Johnson had created three different, conflicting agreements of sale, for varying prices and varying portions of the property. When the buyer was interviewed, she explained that, contrary to Johnson's denial in court, she and Johnson had known each other for over 15 years. Johnson had promised to make the buyer's mortgage payments for her. The buyer, in turn, promised to return title to Johnson after a couple of years. In effect, the sale was a "straw purchase," designed to look as if Johnson was divesting herself of the property, when in reality she would remain in real control.

On her Pennsylvania personal income tax return, Johnson claimed that she earned a total of only \$35,900 in 2017, all of it in salary as MECA's director. However, that was tens of thousands of dollars less than she actually received from MECA. Throughout the year, Johnson repeatedly wrote checks for "cash" on MECA's account, in varying amounts, whenever she needed extra money - in particular when she needed to clear her many debts to the city before starting her employment there. She also directly used MECA funds for personal expenses such as clothing and family travel. All of this was on top of Johnson's apparently modest salary, and in addition to the "rent" checks she wrote herself from MECA (many of which were actually thefts, since she stopped operating the Tioga property as a MECA group home in February 2017, but kept paying herself another \$50,000 in "rent" through the rest of the year.) Ultimately, Johnson failed to report all the extra "income" she stole from MECA's accounts.

Johnson also overstated her expenses on her state tax return. For the Tioga Street property, Johnson claimed that she paid \$36,300 in mortgage interest, \$45,000 in taxes, and \$60,000 in "rental expenses." A consulted expert, however, established that Johnson could not have paid \$36,000 in mortgage interest in a single year (on a property that originally cost her only \$400,000). For 2015 and 2016, Johnson claimed zero interest. Similarly, Johnson's claim that she paid \$45,000 in taxes on Tioga was also inflated. A tax bill of that size might be expected for a large commercial property, but not on a modest residential rental building in North Philadelphia. A record review revealed no more than about \$6,000 in rental expenses for 2017 for all of Johnson's properties, rather than the ten-times-larger figure Johnson claimed for Tioga alone. The evidence indicates that Johnson invented these expenses in order to reduce her tax bill.



## POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 12/4/17	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

Non-profit charitable organizations such as MECA do not have to pay taxes and need not file with the state. Despite their tax-exempt status, however, charities must still file a special form – Form 990 – with the federal government in order to provide at least some measure of accountability. Johnson made false statements on this form as well.

The accountant who prepared MECA's Form 990s stated that she relied entirely on information she received from Johnson on a worksheet entitled "Statement of Activities." In the statement, Johnson claimed that MECA spent \$67,500 in 2017 for repairs on the properties it rented from her. It is unclear why MECA, as opposed to its landlord (*i.e.*, Johnson) would have been responsible for the cost of property repairs. In any case, Johnson actually spent only about \$6,000 on such repairs, not \$67,500. By inflating MECA's alleged repair costs, Johnson was in effect able to hide more than \$60,000 of the charity's money, making it even easier for her to embezzle it for her own use.

The Pennsylvania's Public Official and Employee Ethics Act requires elected officials, public employees, and candidates to file a Statement of Financial Interests (SFI). These forms are intended to reveal outside sources of income and financial interests and obligations that might conceivably create a conflict of interest for public officials and employees. As a result of her city job and then her election to the Pennsylvania House of Representatives, Johnson was legally required to file ethics act forms on three occasions. Johnson listed false information on all three.

Johnson filed her first SFI on April 30, 2018, while employed at the Philadelphia District Attorney's Office. Johnson failed to disclose any of her income from MECA in section ten of the form. In section thirteen, she failed to disclose her directorship of MECA. In section nine, she failed to disclose any of her many creditors.

On January 28, 2019, Johnson filed another, identical SFI, as the Democratic candidate for the 190<sup>th</sup> District of the Pennsylvania House of Representatives. Once again, she failed to disclose her income from MECA, her directorship of MECA, or her numerous creditors.

On May 1, 2019, having won the election, Johnson filed a new SFI as State Representative. After having been on record in the federal bankruptcy proceedings, she reported her official MECA salary, and identified two creditors, for the Powelton property and the Porsche. But she failed to list her other numerous creditors. Thus neither her constituents nor the general public had an accurate picture of her true financial status.

The Pennsylvania Election Code strictly prohibits incorporated entities, like MECA, from donating to political campaign committees. A review of the relevant records, however – from MECA's bank accounts, Johnson's bank accounts, and the campaign finance reports – reveals repeated violations of that law.

In December 2015, Johnson began her campaign for the office she now holds with a series of checks that illegally moved money directly from her charity to her campaign fund, "Friends of Movita."

In mid-December 2015, Johnson deposited a \$5,000 check drawn on MECA's funds into her personal account; later that month, she sent a contribution for that exact amount to her campaign fund. On December 24, she wrote another check, this time for \$2,000, from MECA to herself; that very same day, she contributed exactly \$2,000 to her campaign. Johnson's campaign finance report showed the \$7,000 in personal contributions, but failed to note that the money came from MECA.

On the last day of the year, Johnson wrote another \$5,000 check from MECA to herself. This time, she added an additional layer of disguise – by immediately writing a \$5,000 check not to the campaign, but to a relative. That check was promptly deposited into the relative's personal bank account, from where it turned into another check – for \$5,000 – to "Friends of Movita." The campaign finance report neglected to note that MECA, not the relative, was the true source of the money. Thus, in the space of one week, the campaign was enriched by \$12,000 of the non-profit's funds.

There were more illegal expenditures, both before and even after the election. The chart below shows a series of payments for campaign costs. None of these checks were drawn on the campaign's account, or even Johnson's personal account. Instead, Johnson paid off these political debts with checks from MECA:



# POLICE CRIMINAL COMPLAINT

<b>Docket Number:</b>	<b>Date Filed:</b> 12/4/19	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> 36-714
<b>Defendant Name:</b>	<b>First:</b> MOVITA	<b>Middle:</b> RENEE	<b>Last:</b> JOHNSON HARRELL

Check #	Date on Check	Date Deposited	Payee	Amount	Memo Line
2071	4/1/16	4/4/16	Michelle Jackson	\$350.00	Field Work
2084	4/26/16	5/6/16	Northern Liberty Press	\$435.00	Literature
2087	4/27/16	4/28/16	Craig Thompson	\$1,200.00	Canvassing
2092	5/12/16	5/16/16	Rasheen Crews	\$1,000.00	Field
2094	5/11/16	5/20/16	Terrance Burns	\$500.00	Vending
2101	6/1/16	6/3/16	Rasheen Crews	\$1,500.00	Field
				<b>Total =</b>	
				<b>\$4,985.00</b>	

On January 25, 2019, Johnson resigned her position at the District Attorney's Office. On January 27, she opened a new bank account for her campaign committee, once again entitled "Friends of Movita." A week later, she deposited into her own account a \$7,500 bank check – one of the bank checks she had previously purchased with MECA funds and then concealed from the bankruptcy court. At the same time, she also wrote another check to herself from MECA, in the amount of \$5,000, and put that into her personal account as well. The deposits totaled \$12,500. She then immediately transferred the \$12,500 to the "Friends of Movita."

Thus, Johnson began her 2019 campaign much like her 2015-16 campaign, with a \$12,500 campaign contribution of MECA's money. The "Friends of Movita" treasurer said she had no access to the campaign bank account and no information about the campaign finances beyond whatever Johnson chose to tell her.

Johnson did not tell her treasurer the truth about the \$12,500. Johnson instructed the treasurer to record the money as a loan, not a contribution, telling the treasurer that the money came from Johnson's own personal funds. Johnson also lied, however, about the actual amount of the deposit. Although she had only put \$12,500 into the "Friends of Movita" account, she told the treasurer that she had actually deposited \$15,000. Because Johnson had denied her any access to the campaign account statements, the treasurer had no way to know any better; she duly recorded the amount as a \$15,000 personal loan on the campaign's disclosure report.

That was Johnson's only financial contribution to the campaign until shortly before the election. A political consultant who had worked on the campaign at the request of the Democratic Party reported, like the treasurer, that Johnson personally handled all the finances. He handed her any contribution checks he received, and she personally gave him any payments required for campaign expenditures.

The consultant said that, with one week left before the election, the campaign was running out of money. He told Johnson they needed an infusion of cash; he estimated they would have to spend \$30,000. Johnson told him she would take care of it. Johnson was in possession of a bank check in the amount of \$30,000. She had purchased the check shortly after entering bankruptcy, with money derived from the \$70,000 fake "loan" she had "repaid" herself out of MECA funds. This was one of the bank checks she had neglected to tell the bankruptcy court about. On March 11, 2019, the day before the election, Johnson deposited the check into the "Friends of Movita" account. She immediately withdrew \$15,000 in cash and left the remainder as a secret, unreported campaign loan. As with her previous "loan" to the campaign two months earlier.

Campaign finance reports filed on behalf of Johnson, which she reviewed and signed, failed to accurately disclose receipts and expenditures. In addition to the use of MECA funds for Johnson's campaign, Johnson failed to report \$13,990.76 in campaign expenditures incurred around the time of the 2019 election.

Based on the facts as set forth above, the affiant is requesting an arrest warrant be issued for the defendant, Movita Johnson Harrell charging: Theft by Unlawful Taking, 18 Pa.C.S. § 3921(a); Theft by Deception, 18 Pa.C.S. § 3922(a)(1); Tampering with Public Records or Information, 18 Pa.C.S. § 4911(a)(2); Perjury, 18 Pa.C.S. § 4902(a); Statement of Financial Interests, 65 Pa.C.S. § 1109(b); and Reporting by Candidate and Political Committees and other Persons, 25 P.S. § 3543.

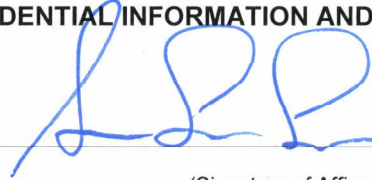


# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: <u>12/4/19</u>	OTN/LiveScan Number	Complaint/Incident Number 36-714
Defendant Name:	First: MOVITA	Middle: RENEE	Last: JOHNSON HARRELL

I, SEAN M. MCGLINN, 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.

 -572  
(Signature of Affiant)

Sworn to me and subscribed before me this 12/4/19 day of Dec  
Date 12/4/19, Magisterial District Judge

My commission expires first Monday of January,

