

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: LEHIGH



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 31-1-05
MDJ: Hon. MICHAEL D. D'AMORE
Address: 1007 UNION BLVD
ALLENTOWN, PA 18109
Telephone: (610) 439-0661

DEFENDANT: (NAME and ADDRESS):
Zoraida Flores
First Name Middle Name Last Name Gen.
1140 E. Woodlawn Street, Apt 309, Allentown, PA 18109

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR 250-20	Date Filed 7/23/2020	OTN/LiveScan Number U896110-5	Complaint/Incident Number 56-2805	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/23/1972	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name Zoraida	Middle Name	Last Name Flores	Gen.	
AKA				

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic 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"/> XXX (Unknown)

DNA YES NO DNA Location WEIGHT (lbs.)

FBI Number MNU Number 120

Defendant Fingerprinted YES NO Ft. HEIGHT in.

Fingerprint Classification: 5 3

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <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).

DAG LAUCELLA *Michael Laucella* 07/23/2020
(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, Caitlin Smith 574
(Name of the Affiant) (PSP/MP/POETC -Assigned Affiant ID Number & Badge #)

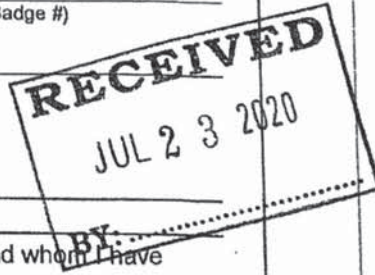
of PA OAG PA 0222400
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

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 301 1140 EAST WOODLAWN
(Subdivision Code) (Place-Political Subdivision)
ST, APT 309, ALLENTOWN 18109

in Lehigh County [39] on or about July, 2019 through October, 2019
(County Code) (Offense Date)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 7 / 23 / 2020	OTN/LiveScan Number	Complaint/Incident Number 56-2805
Defendant Name	First: Zoraida	Middle:	Last: Flores

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.)

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 <u>0</u>
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<input checked="" type="checkbox"/>	1	6312	B1	of the	18	10	F1		
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
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Statute Description (include the name of statute or ordinance):
 Sexual Abuse of Children - Photographing, videotaping, depicting on computer or filming sexual acts
 Acts of the accused associated with this Offense:
 See continuation page

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 <u>0</u>
------------------	----------------------------------------------	---------------------------------------------------	-----------------------------------------------	--------------------------------------------

<input type="checkbox"/>	2	6312	B2	of the	18	10	F1		
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):
 Sexual Abuse of Children - Photographing, videotaping, depicting on computer or filming sexual acts
 Acts of the accused associated with this Offense:
 See continuation page

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 <u>0</u>
------------------	----------------------------------------------	---------------------------------------------------	-----------------------------------------------	--------------------------------------------

<input type="checkbox"/>	3	6312	D	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):
 Sexual Abuse of Children - Possession of Child Pornography
 Acts of the accused associated with this Offense:
 See continuation page



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 07/23/ 2020	OTN/LiveScan Number	Complaint/Incident Number 56-2805
Defendant Name	First: ZORAIDA	Middle:	Last: FLORES

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.)

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 <u>0</u>				
<input type="checkbox"/>	4	3126	A8 of the	18	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): Indecent Assault								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

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	3126	A6 of the	18	1	M1		
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): Indecent Assault								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

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	6318	A5 of the	18	1	F1		
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): Unlawful Contact with a Minor								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 07/23/2020	OTN/LiveScan Number	Complaint/Incident Number 56-2805
Defendant Name	First: ZORAIDA	Middle:	Last: FLORES

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.)

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 <u>0</u>				
<input type="checkbox"/>	7	6301	A1ii of the	18	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): Corruption of Minors								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

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	4304	A1 of the	18	1	M1		
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): Endangering Welfare of Children								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

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"/>	9	6312	D of the	18	20	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Sexual Abuse of Children - Possession of Child Pornography								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 07/23/ 2020	OTN/LiveScan Number	Complaint/Incident Number 56-2805
Defendant Name	First: ZORAIDA	Middle:	Last: FLORES

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.)

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 <u>0</u>				
<input type="checkbox"/>	10	6312	D of the	18	40	F-3		
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): Sexual Abuse of Children - Possession of Child Pornography								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

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"/>	11	6312	C of the	18	2	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"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): Sexual Abuse of Children - Dissemination of Child Pornography								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

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"/>	12	7512	A of the	18	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): Criminal Use of a Communication Facility								
Acts of the accused associated with this Offense: SEE CONTINUATION PAGE								

Zoraida Flores

Charge 1, 6312(b)(1) (F1) continuation

The Defendant, on or about, July, 2019 through October, 2019, did cause or knowingly permit a child under the age of 18 years to engage in a prohibited sexual act or in the simulation of such act knew or had reason to know or intend that the act be photographed, videotaped, depicted on computer or filmed and the images depicted indecent contact with said child; to wit, the defendant did cause her step-daughter, A.L., DOB 2/12/06, to engage in prohibited sexual acts or in the simulation of such acts including but not limited to indecent assault, and had reason to know or intended that the acts be photographed.

Charge 2, 6312(b)(2) (F1) continuation

The Defendant, on or about, July, 2019 through October, 2019, did knowingly photograph, videotape, depict on computer or films a child under the age of 18 years engaged in a prohibited sexual act or in the simulation of such an act and the images depicted indecent contact with said child; to wit, the defendant did photograph her step-daughter, A.L., DOB 2/12/06, to engage in prohibited sexual acts or in the simulation of such acts including but not limited to indecent assault, and had reason to know or intended that the acts be photographed.

Charge 3, 6312(d) (F2) continuation

The Defendant, on or about, July, 2019 through October, 2019, intentionally viewed or knowingly possessed or controlled any book, magazine, pamphlet, slide, photograph, film, videotape, computer depiction or other material depicting a child under the age of 18 years engaging in a prohibited sexual act or in the simulation of such act and the images depicted indecent contact with said child; to wit, the defendant possessed photos of her step-daughter, A.L., DOB 2/12/06, engaged in prohibited sexual acts or in the simulation of such acts, including but not limited to indecent assault, on her cell phone.

Charge 4, 3126(a)(8) (M2) continuation

The Defendant; on or about, July 2019 through October, 2019, had indecent contact with the complainant, caused the complainant to have indecent contact with the defendant, for the purpose of arousing sexual desire in the person or the complainant and the complainant is less than 16 years of age and the person is four or more years older than the complainant and the complainant and the person are not married to each other; to wit, the defendant did touch the breasts and genitalia of her stepdaughter, A.L., DOB 2/12/06, for the purpose of arousing sexual desire.

Charge 5, 3126(a)(6) (M1) continuation

The Defendant, on or about, July 2019 through October, 2019, had indecent contact with the complainant, caused the complainant to have indecent contact with the defendant, for the purpose of arousing sexual desire in the person or the complainant and the complainant suffers from a mental disability which renders the complainant incapable of consent; to wit, the defendant did touch the breasts and genitalia of her stepdaughter, A.L., DOB 2/12/06, for the purpose of arousing sexual desire, and the complainant, A.L. suffer from a mental disability that renders her incapable of consent.

Charge 6, 6318(a)(5) (F1) continuation

The Defendant, on or about, July, 2019 through October, 2019, intentionally had contact with a minor, or a law enforcement officer acting in the performance of her duties who has assumed the identity of a minor, for the purpose of engaging in an activity prohibited under any of the following, and either the person initiating the contact or the person being contacted is within this Commonwealth; for the purpose of Sexual abuse of children as defined in section 6312 (relating to sexual abuse of children); to wit, did photograph her step-daughter, A.L., DOB 2/12/06 engaging in prohibited sexual acts or in the simulation of such acts including but not limited to indecent assault.

Charge 7, 6301(a)(1)(ii) (F3) continuation

The Defendant, an adult, on or about, July, 2019 through October, 2019, committed a course of conduct in violation of Chapter 31 (relating to sexual offenses) that corrupts or tends to corrupt the morals of any minor less than 18 years of age; to wit, the defendant did touch the genitalia and the breasts of her step-daughter, A.L., DOB 2/12/06, multiple times in violation of Indecent Assault, 18 Pa.C.S. 3126(a)(6) and 3126(a)(8), and did photograph this indecent contact.

Charge 8, 4304(a)(1) (M1) continuation

The Defendant, on or about July, 2019 through October, 2019, as a parent, guardian or other person supervising the welfare of a child under 18 years of age, did knowingly endanger the welfare of the child by violating a duty of care, protection or support; to wit, the defendant did touch the genitalia and the breasts of her step-daughter, A.L., DOB 2/12/06, multiple times in violation of Indecent Assault, 18 Pa.C.S. 3126(a)(6) and 3126(a)(8), and did photograph this indecent contact.

Charge 9, 6312(d) (F2) continuation

The Defendant, on or about, July, 2019 through October, 2019, intentionally viewed or knowingly possessed or controlled any book, magazine, pamphlet, slide, photograph, film, videotape, computer depiction or other material depicting a child under the age of 18 years engaging in a prohibited sexual act or in the simulation of such act and the images depicted indecent contact with said child; to wit, the defendant possessed at least twenty images of children engaged in prohibited sexual acts and showing indecent contact with said children on her cell phone.

Charge 10, 6312(d) (F3) continuation

The Defendant, on or about, July, 2019 through October, 2019, intentionally viewed or knowingly possessed or controlled any book, magazine, pamphlet, slide, photograph, film, videotape, computer depiction or other material depicting a child under the age of 18 years engaging in a prohibited sexual act or in the simulation of such act; to wit, the defendant possessed at least forty images of children engaged in prohibited sexual acts on her cell phone.

Charge 11, 6312(c) (F2) continuation

The defendant, on or about July, 2019 through October, 2019, did knowingly sell, distribute, deliver, disseminate, transfer, display or exhibited to others, or possessed for the purpose of sale, distribution, delivery, dissemination, transfer, display or exhibition to others, any book, magazine, pamphlet, slide,

photograph, film, videotape, computer depiction or other material depicting a child under the age of 18 years engaging in a prohibited sexual act or in the simulation of such act; to wit, the defendant did upload at least three images of children engaged in prohibited sexual acts, including indecent contact with said children, via Facebook.

Charge 12, 7512 (F3) continuation

The defendant, on or about July, 2019 through October, 2019, used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony under this title; to wit, the defendant did use her cell phone to commit the felonies described in greater detail herein.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 7 / 23 / 2020	OTN/LiveScan Number	Complaint/Incident Number 56-2805
Defendant Name	First: Zoraida	Middle:	Last: Flores

- 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 ___ 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.)

July 23, 2020
 (Date) (Year)

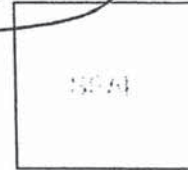
Caitlin Smith # 574
 (Signature of Affiant)

AND NOW, on this date July 23 2020 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.

31-1-05
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:		Date Filed: 07/23/2020	OTN/Live Scan Number:	Complaint/Incident Number 56-2805
Defendant Name:	First: ZORAIDA	Middle:	Last: FLORES	

AFFIDAVIT of PROBABLE CAUSE

I, Special Agent Caitlin Smith, after being duly sworn, hereby states the following:

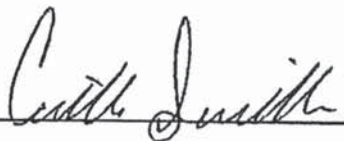
Your affiant is a Special Agent with the Pennsylvania Office of Attorney General's Child Predator Section. Your affiant is assigned to the Internet Crimes Against Children (ICAC) Task Force which is comprised of Federal, State, and Local Law Enforcement. The task force is responsible for conducting undercover online investigations, responding to complaints regarding children sexually exploited via the Internet and monitoring of the Internet for individuals bartering in child pornography. Your affiant has been investigating internet crimes against children since September 2018. Your affiant has been employed as a Special Agent with the Pennsylvania Office of Attorney General since September 2018. Prior to the current position of Special Agent, your affiant worked for the Philadelphia Police Department for 2.5 years, as a patrol officer.

Your affiant's duties include investigating violations of state law, such as the online exploitation of children. In particular, violations of Title 18, Section 6312, that criminalizes the possession, receipt, and transmission of child pornography and violations of Title 18, Section 6318 (b.1)[to pro-actively conduct investigations involving child predators who wish to engage in sexual activity with minors].


This investigation began when your Affiant received CyberTip 52247761 from the National Center for Missing and Exploited Children (NCMEC). Reports to NCMEC are typically generated in two different fashions. The first way that reports are generated are from an employee of the Electronic Service Provider (ESP) viewing material on their network believed to be child exploitation material and then making a report to NCMEC. NCMEC then generates a CyberTip based off of the ESP's report and sends the CyberTip to the appropriate law enforcement agency for investigation. The second way that reports are generated occurs when ESP's have an automated system in place that compares HASH signatures of files crossing their servers to a non-law enforcement list of HASH signatures that correspond to known images of child pornography. If the HASH values of the image found by the automated program on the ESP's network match the HASH values for known images of child pornography, then the automated system generates a report to NCMEC automatically. NCMEC then generates a CyberTip based off of the ESP's automated report and sends the CyberTip to the appropriate law enforcement agency for investigation.

CyberTip 52247761 contained a written report as well as attached images. Upon receiving CyberTip 52247761 your Affiant learned that the ESP who made the report to NCMEC was Facebook. Facebook provided the following information for CyberTip 52247761 and for the individual being reported regarding the possible possession, manufacture, and/or distribution of illegal content:

Name: Elly Brons
Mobile Phone: +14845500562
Date of Birth: 01-01-1990



(Signature of Affiant)

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7/23/2020

**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

Docket Number:		Date Filed: 07/23/2020	OTN/Live Scan Number:	Complaint/Incident Number 56-2805
Defendant Name:	First: ZORAIDA	Middle:	Last: FLORES	

AFFIDAVIT of PROBABLE CAUSE

Approximate Age: 29
 Screen/User Name: elly.brons.96
 ESP User ID: 100035194671277
 Profile URL: <http://www.facebook.com/elly.brons.96>
 IP Address: 209.122.10.208 07-13-2019 15:08:07 UTC

Facebook reported that child pornography was uploaded and shared on their platform. According to CyberTip 52247761, Facebook reported that one (1) sexually explicit, child pornography image was uploaded to Facebook on July 13, 2019 at 17:57:38 UTC. Facebook ranked the content of the image uploaded. Facebook utilizes an Image Categorization by ESP, "A" for [Prepubescent Minor] and "B" for [Pubescent Minor]. Additionally, it narrows the image content with a one (1) or a two (2). One (1) indicates a "Sex Act," whereas two (2), indicates a Lascivious Exhibition." Specifically, this image was ranked as being B2.

- File Name: 9mevpt4yb18gcskc64859725_629628817517560_1135718305160495104_n.jpg
 Description: The image depicts a nude female laying down on what appears to be a bed with her vagina exposed to the viewer. A naked adult female is touching the child's vagina with her hand. Another unknown person has their hand near the child's face.

Your Affiant viewed the above file and confirmed that the image appears to depict children, under the age of eighteen (18) years old engaged in sexual acts and/or pose, and is believed to be child pornography in violation of Pennsylvania Crimes Code Section 6312 - Sexual Abuse of Children. Facebook captured the IP address which was used to upload the file as being 209.122.10.208.

Your Affiant was assigned two additional CyberTips relating to CyberTip 52247761. They are CyberTips 42925086 and 42992765. Facebook reported that one (1) sexually explicit, child pornography image was uploaded in each CyberTip. Facebook confirmed that the files in question and its entire contents were reviewed by staff. Below is a brief description of each file in each CyberTip.

CyberTip-42985086
 IP Address: 2607:fb90:2b17:9f71:c4bf:9121:7153:ab93
 File Name: f0xggwizpy8gsooc45585042_691386507901030_5853538793742663680_n.jpg
 Description: This image depicts a close up view of a female child's vagina.

CyberTip 42992765
 IP Address: 2607:fb90:60ef:4fe2:f59c:8ce8:badc:b186
 File Name: 8j8aqftu1s84gw8k45699014_2152288668135819_3192335842634891264_n.mp4
 Description: This video is one minute and twenty-six seconds long. It depicts a 4-5 year old female laying down while an adult male is inserting his penis in her vagina.

(Signature of Affiant)

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AFFIDAVIT of PROBABLE CAUSE

Your Affiant viewed the above files and confirmed that the files appear to depict children, under the age of eighteen (18) years old, engaged in sexual acts and/or pose, and is believed to be child pornography in violation of Pennsylvania Crimes Code Section 6312 - Sexual Abuse of Children.

CyberTip 42992765 contained a written report as well as an attached video. Upon receiving CyberTip 42992765 your Affiant learned that the ESP who made the report to NCMEC was Facebook. Facebook provided the following information for CyberTip 42992765 and for the individual being reported regarding the possible possession, manufacture, and/or distribution of illegal content:

Name: Melly Lebron
 Date of Birth: 09-14-1990
 Approximate Age: 28
 Email Address: mellylebron53@yahoo.com
 Screen/User Name: melly.lebron.9
 ESP User ID: 100020285053958
 Profile URL: <http://www.facebook.com/melly.lebron.9>
 IP Address: 209.122.10.208 (Login)
 11-08-2018 17:56:53 UTC
 IP Address: 2607:fb90:60ef:4fe2:f59c:8ce8:badc:b186
 11-09-2018 18:20:09 UTC

CyberTip 42985086 contained a written report along with an attached image. Upon receiving CyberTip 42985086 your Affiant learned that the ESP who made the report to NCMEC was Facebook. Facebook provided the following information for CyberTip 42985086 and for the individual being reported regarding the possible possession, manufacture, and/or distribution of illegal content:

Name: Melly Lebron
 Mobile Phone: +14845500562
 Date of Birth: 12-31-1990
 Approximate Age: 27
 Screen/User Name: melly.lebron.3
 ESP User ID: 100023310270268
 Profile URL: <http://www.facebook.com/melly.lebron.3>
 IP Address: 2607:fb90:6095:30f0:7c10:25d4:9dcd:3cc7 (Login)
 11-07-2018 17:57:12 UTC
 IP Address: 2607:fb90:2b17:9f71:c4bf:9121:7153:ab93
 11-08-2018 00:51:46 UTC

Caith Smith

(Signature of Affiant)

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The person being reported in each of these CyberTips has very similar screen names. The mobile phone number 484-550-0562 is used in CyberTip 42925086 and 52247761. CyberTip 52247761 and CyberTip 42992765 captured the login IP address being 209.122.10.208. In CyberTip 52247761, the IP address captured for the uploaded image is 209.122.10.208.

NCMEC's System geographically located the IP address using a publicly available online query. In this case, the IP address 209.122.10.208 belonged to Internet Service Provider RCN Telecom Services and was geolocated by NCMEC to Nazareth, PA.

On September 03, 2019, an administrative subpoena was sent to RCN for subscriber information pertaining to IP address 209.122.10.208 on July 13, 2019 at 15:08:07 UTC. RCN provided the following information for CyberTip 52247761:

Subscriber Name: Norman Lugo Rodriguez
 Subscriber Address: 1140 E. Woodlawn St., APT 309, Allentown, PA 18109-3456
 Billing Information: Same as Subscriber Address
 Account Activation Date: 11/08/2018
 Account Deactivation Date: Account Still Active
 Associated Phone Numbers: 484-893-9028
 Associated Email Address: mrlugo@gmail.com

On September 10, 2019, an administrative subpoena was sent to T-Mobile requesting subscriber information pertaining to IP address 2607:fb90:60ef:4fe2:f59c:8ce8:badc:b186 on November 9, 2018 at 18:20:09 UTC, 2607:fb90:2b17:9f71:c4bf:9121:7153:ab93 on November 8, 2018 at 01:06:57, and phone number 484-550-0562. T-Mobile provided the following information for CyberTip 42992765 and CyberTip 42925086 and for the individual being reported regarding the possible possession, manufacture, and/or distribution of illegal content:

Subscriber Name: Norman Lugo
 Subscriber Address: 1140 E. Woodlawn St., APT 309, Allentown, PA 18109-3456
 Subscriber Status: Canceled
 Subscriber Name Effective Date: 10/04/2014
 Account Expiration Date: 07/03/2019
 MSISDN No: 4845500562
 MSISDN Status: Canceled

Cathy Smith

(Signature of Affiant)

[Handwritten Signature]

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On October 16, 2019 MDJ Michael D. D'Amore signed and approved the search warrant for 1140 E. Woodlawn St., Apt 309, Allentown, PA 18109.

On October 17, 2019 at approximately 8:15am agents from the Pennsylvania Office of Attorney General (PAOAG), Homeland Security Investigations (HSI), and officers from the Allentown Police Department executed a search warrant for 1140 E. Woodlawn St., APT 309, Allentown, PA 18109.

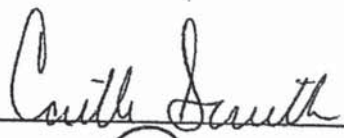
An adult male and adult female answered the door. Your Affiant informed Norman Lugo-Rodriguez of the search warrant and asked to speak with him in the kitchen. Your Affiant read Lugo-Rodriguez his Miranda Warnings. Lugo-Rodriguez was able to read his Rights, per Miranda, and waived his rights and agreed to speak with Special Agent Brian King and your Affiant.

Lugo-Rodriguez stated Zoraida Flores and him are the only people residing in the residence. He stated his daughter has special needs and comes over every other weekend. He confirmed RCN is his internet provider and has been for the past year. He explained that he utilizes Facebook and has a T-Mobile cellular phone. He stated the phone number 484-550-0562 which is associated with the CyberTip was his girlfriend's Zoraida Flores old phone number. He stated she canceled the phone and got a new phone number a few months ago. He stated he never saw child pornography.

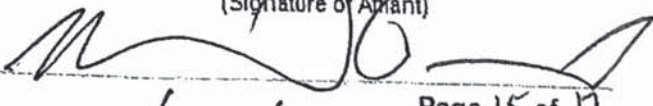
Your Affiant spoke with Zoraida Flores and she was read her Miranda Warnings. She was able to read her Rights, per Miranda, and waived her rights and agreed to speak with Special Agent King and your Affiant. She stated she did not remember her passcode to her new cell phone that she got two weeks prior. She also stated she forgot there was a cell phone in the safe that was found. She consented to an account takeover for her Gmail Account which was used as a secondary email on the Facebook account in CyberTip 42992765. She signed and consented the Account Takeover Form. She also stated she forgot her Gmail Account password. Agents were unable to sign into her Gmail Account. The Gmail Account given by Flores on the day of the search warrant was the Gmail account associated with Cybertip 42992765, referencing melly.lebron.9 and the uploading of child pornography onto Facebook.

On 10/25/2019, Your Affiant effected a search warrant, on Facebook requesting, all data from the accounts "elly.brons.96, melly.lebron.9, and melly.lebron.3." Your Affiant received over 10,000 pages of information, most of which were in Spanish. A bilingual Narcotics Agent translated information from Spanish to English. In the messages, already translated, it states that "Elly" indecently touched her step daughter. Below is a summary of the conversations translated:

Brandon: Have you touched breasts other than yours
Elly: Yes.
Brandon: Who's



 (Signature of Affiant)



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Elly: my step daughters.

Brandon: And what do you do to them ?

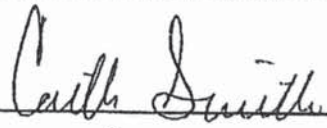
Elly: I caress them and two times I have sucked them while she was sleeping.

Your Affiant has probable cause to believe "Elly" is Zoraida Flores and she is referring to minor child, A.L., DOB 2/12/06, as her stepdaughter in the above conversation. Your Affiant knows that A.L. is the biological daughter of Lugo Rodriguez, Zoraida Flores' boyfriend with whom she resides. Your Affiant knows that A.L. resides with Zoraida Flores and her boyfriend every other weekend and that Lugo Rodriguez shares custody of his daughter, A.L., with the child's biological mother.

On July 22, 2020, FBI SA Daniel Johns previewed and searched Zoraida's I-Phone that was seized on October 17, 2019. During the search of the phone, several images of child pornography were found. Specifically, a file timestamped October 10, 2019, Zoraida Flores is seen grabbing the nude breast of the female minor child, identified by your Affiant, as A.L., DOB 2/12/06, Zoraida's step-daughter. Your Affiant is aware through her investigation that A.L. suffers from a mental disability and is not capable of forming consent. Your Affiant reviewed the images of A.L. found on the defendant's cellular phone and there were at least ten (10) images of what appears to be Zoraida undressing A.L., with A.L.'s genitalia, buttocks, and breasts exposed for the camera. In one of the photos, what appears to be Zoraida's hand is seen touching the nude genitalia of A.L. In the images of A.L., it appears that Zoraida is undressing A.L. and photographing A.L. nude and in various states of undress. At least three (3) of the photos consist of what appears to be Zoraida's hand touching the nude breast of A.L. During the forensic search, exif data from the images of A.L. included GPS Coordinates of these images. The coordinates were searched using open source mapping services and resolved to the vicinity of the apartment complex 1140 E. Woodlawn Street, Allentown, PA 18109, the residence of Zoraida Flores. Additionally, your Affiant is familiar with the background scene of the images of A.L. and knows from the execution of the search warrant that the bathroom depicted in the background of the images matches the bathroom located in the Zoraida Flores residence at 1140 E. Woodlawn Street, Allentown.

In addition to the images of A.L., the forensics review of the cell phone belonging to the defendant uncovered at least twenty (20) images of child pornography, that is, images of children under the age of eighteen engaged in prohibited sexual acts, including indecent contact with adults, such as oral, anal and or vaginal intercourse with children. In addition, the forensic review of the cell phone belonging to the defendant uncovered at least (40) images of child pornography, that is, images of children, engaged in prohibited sexual acts, including the lewd exhibition of their genitalia.

Based on the totality of the foregoing information, circumstances and reasonable inferences to be drawn therefrom, your Affiant submits that there is probable cause for the filing of this criminal complaint charging the Actor, "Zoraida Flores" (DOB: 11/23/1972) an adult female, with the aforementioned crimes described including



(Signature of Affiant)



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AFFIDAVIT of PROBABLE CAUSE

Sexual Abuse of Children, Unlawful Contact with a Minor, Indecent Assault, Endangering the Welfare of Children, Corruption of Minors, and Criminal Use of a Communication Facility among other offenses.

Cynthia Smith

(Signature of Affiant)

[Signature]

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