

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ Name: Hon. DOMINIC PELINO
Address: 676 EAST MAIN STREET
HUMMELSTOWN, PA 17036
Telephone: (717) 583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
LEROY LAMING BARNES III
First Name Middle Name Last Name Gen.
SCI PHOENIX
1200 MOKYCHIC ROAD
COLLEGEVILLE, PA 19426

NCIC EXTRADITION CODE TYPE

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pend.	<input type="checkbox"/> C-Misdemeanor Surrounding States	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: C1242-20 Date Filed: 09/22/20 OTN/LiveScan Number: U915894-0 Complaint/Incident Number: OCE-20-0030-2 Request Lab Services? ☐ YES ☒ NO

GENDER: ☒ Male ☐ Female DOB: 12/04/1991 POB: Add'l DOB: Co-Defendant(s) ☐

AKA: First Name: Middle Name: Last Name: Gen.

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

ETHNICITY: ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR: ☐ GRY (Gray) ☐ RED (Red / Auburn) ☐ 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.): UNKNOWN

FBI Number: MNU Number: Ft. HEIGHT In.: 5 10

Defendant Fingerprinted: ☐ YES ☒ NO

Fingerprint Classification:

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. Pa.R.Crim.P.607.)

SDAG HEATHER CASTELLINO
(Name of Attorney for Commonwealth - Please Print or Type)

Approved via Phone
(Signature of Attorney for Commonwealth)

09/22/2020
(Date)

I, SPECIAL AGENT ROBERT MCHUGH
(Name of Affiant - Please Print or Type)

#516
(PSP/MP/OTEC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania Office of Attorney General and Pennsylvania State Police.
(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 is 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 PA DEPARTMENT OF LABOR & INDUSTRY, 651
(Subdivision Code) BOAS STREET, HARRISBURG, PA 17121
(Place-Political Subdivision)

in DAUPHIN County

22
(County Code)

on or about JUNE 30, 2020 TO AUGUST 10, 2020
(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR2420	Date Filed: 09/22/20	OTN/LiveScan Number: U913894-0	Complaint/Incident Number OCE-20-0030-2
Defendant Name	First: LEROY	Middle: LAMING	Last: BARNES III

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 checked="" 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: 0
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<input checked="" type="checkbox"/> Lead?	1	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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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):

ATTEMPT - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant, with intent to commit theft by unlawful taking, committed an act or acts constituting a substantial step toward the commission of that crime, in that he unlawfully took or exercised unlawful control over movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. TO WIT: During the COVID-19 pandemic, Leroy BARNES, and others on his behalf, falsely filed an application for the Pandemic Unemployment Assistance benefit program even though BARNES did not qualify for those funds.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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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):

CRIMINAL CONSPIRACY - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, during July of 2020, within the County of Dauphin, Montgomery and Delaware, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-212-20	Date Filed: 09/22/20	OTN/LiveScan Number: U 915894-0	Complaint/Incident Number OCE-20-0030-2
Defendant Name	First: LEROY	Middle: LAMING	Last: BARNES III

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 checked="" type="checkbox"/> Conspiracy 18 903
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Number of Victims Age 60 or Older: 0

<input type="checkbox"/> Lead?	3	7512	(a)	of the	Title 18, PA Crimes Code	1	F3		
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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):
CRIMINAL USE OF A COMMUNICATION FACILITY

Acts of the accused associated with this Offense:

In that the Defendant, 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 or under the act of April 14, 1972 (P.L.233, No.64), known as the Controll Substance Drug, Device and Cosmetic Act. TO WIT: Leroy BARNES and others utilized electronic communications through the Department of Corrections SCI Phoenix electronic messaging system to send names, dates of birth and social security numbers to be used to submit fraudulent Pandemic Unemployment Assistance applications on the PA Department of Labor and Industry Website.

Inchoate Offense	<input checked="" type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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Number of Victims Age 60 or Older: 0

<input type="checkbox"/> Lead?	4	3922	(a)(3)	of the	Title 18, PA Crimes Code	1	M3		
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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):
ATTEMPT - THEFT BY DECEPTION

Acts of the accused associated with this Offense:

The Defendant, with intent to commit theft by deception, committed an act or acts constituting a substantial step toward the commission of that crime, in that he intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Leroy BARNES and others falsely filed an application for the Pandemic Unemployment Assistance benefit program even though BARNES did not qualify for those funds. On each application, the applicant must certify the information they provided is true and correct.



POLICE CRIMINAL COMPLAINT

Report Number: 00420	Date Filed: 09/22/20	OTN/LiveScan Number U915894-0	Complaint/Incident Number OCE-20-0030-2
Defendant Name	First: LEROY	Middle: LAMING	Last: BARNES III

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	Offense # 5	Section 3922	Subsection (a)(3)	of the	Title 18, PA Crimes Code	Counts 1	Grade M3	NCIC Offense Code	UCR/NIBRS Code
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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): CRIMINAL CONSPIRACY - THEFT BY DECEPTION

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently perform the promise. TO WIT: Leroy BARNES and others falsely filed an application for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for BARNES even though he did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct.

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: 0
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<input type="checkbox"/> Lead?	Offense #	Section	Subsection	of the	Title	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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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):
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Acts of the accused associated with this Offense:
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POLICE CRIMINAL COMPLAINT

Docket Number: <u>CSD20</u>	Date Filed: 09/22/20	OTN/LiveScan Number: <u>U915814-0</u>	Complaint/Incident Number OCE-20-0030-2
Defendant Name	First: LEROY	Middle: LAMING	Last: BARNES III

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 3
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently 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.)

SEPTEMBER 22, 2020

(Date)

(Signature of Affiant)

AND NOW, on this date, 9/21/2020 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.

12304

(Magisterial District Court Number)

(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA

v.

Leroy Laming Barnes III

AFFIDAVIT OF PROBABLE CAUSE

Your Affiant, Special Agent Robert McHugh, Office of Attorney General, Bureau of Criminal Investigations being duly sworn, deposes and says:

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the **Pandemic Unemployment Assistance (PUA)** program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: "**Inmates**; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; **Individuals being**

paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution."

On June 1, 2020, the OAG received a referral letter from the Governor's Office requesting that this agency investigate instances of PUA fraud.

FINDINGS OF FACT

Leroy Barnes was convicted of "Persons not to Possess, Use, etc Firearms" on October 17, 2018 and sentenced to three to six years in prison. Barnes is currently incarcerated at State Correctional Institution – Phoenix, located at 1200 Mokychic Road, Collegeville, PA 19426. Barnes has remained in custody since November 2, 2018 and has no record of employment according to PA Department of Labor and Industry (L&I) since the 1st quarter of 2018.

While incarcerated at SCI Phoenix, Barnes has the ability to communicate with individuals outside of prison using the telephone, U.S. Mail or electronic messages through a GTL tablet. All of these methods of communication are monitored by PA Department of Corrections staff. Barnes has had multiple messages "flagged" by PA Department of Corrections staff related to potential PUA fraud.

On June 30, 2020 at 12:02pm, Barnes sent an electronic message through his GTL tablet to an individual identified as Jezkae Jackson:

"Yoo untold ya sister about that PUA pandemic unemployment assistance, I ran out of links and my jpay card acting goofy I still got 129 on this jawn and I cant even take money off smfh... but the pua giving niggas 6 to 7 to 8 to 9k back... my lil brother just got 6k back and getting 600weekly... I told ya sister cause I ain't know when I was gonna get more links... but yoo make ya mom jump on that.... when you put ya ssn in they pull up all ya info and it's for everybody who dont have a job jump on that shit bro and yeah they being nutty cause of carona..."

On August 7, 2020 at 6:31pm, Barnes sent the following electronic message to Jackson:

"Yo bro Thank You for the access bag, I really appreciate that especially when I don't got ask it really let me see your true character you real friend its hard to come by them these days plus you know how it is when you in here but I defiantly got come fuck with you when I get out. I'm glad to know you out there thriving bro being though its so easy to go backwards out there when you first come home dude's priority's be messed but you out there doing you that's Wassup you motivating me I can't wait to these people let free. Where ya new job ? What you going be doing there ? 15 dollars hour that's good jawn bro stack that paper bro. But yea My mom she did do it for me but she said they didn't send anything in mail saying I got the money so we don't know Wassup with it but I sent her the Notary. I mean just text and let know how to check it and see if it went threw. But thanks again bro and keep doing you bro and get with me... oh yea you got ya hair twisted up OK who did it ? Do you like it ?"

On August 10, 2020 at 10:52am, Jackson sent the following message to Barnes: "yeah I fw these jawns I cant stop touching them, I got to get them redone my schedule tight.. but I'll find time... and i just texted her and told her how to check and see if they released ya payments. I texted

her before that and asked her did she finish it and she never texted me back... but the card gonna come tho.. it might take 3wks..."

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding the PUA claim of Leroy Barnes. Pennsylvania L&I records show that the PUA application for Barnes was submitted electronically on August 10, 2020 by an IP address outside of a PA Department of Corrections facility. Your Affiant notes that Barnes was incarcerated on this date, thus making him ineligible to receive PUA. Furthermore, Your Affiant notes that Barnes was not unemployed due to Covid-19, which also means that he would be ineligible to receive PUA.

The Pennsylvania Department of Labor and Industry provided PUA payment information, the last 4 digits of the US Bank Debit Cards where the funds were placed and the address where the debit cards were to be sent. In response to the application submitted on August 10, 2020 using Barnes' name, date of birth and social security number, Pennsylvania L&I generated a US Bank Debit card ending in 6506. Even though a debit card was generated, Pennsylvania L&I has no record of payment to Barnes' debit card. Pennsylvania L&I provided application records showing that the address where the card would have been sent was 1304 Harshaw Road, Brookhaven, PA 19015.

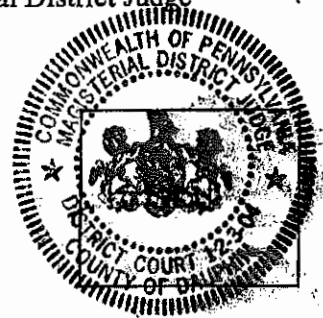
The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of his knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant, Leroy Laming Barnes III.

I, SA ROBERT MCHUGH #516, 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.

Robert McHugh
Special Agent

Sworn to me and subscribed this 21 day of September 2020
9/21/20 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

KEITH

R

CORPREW

First Name

Middle Name

Last Name

SCI Mahanoy, 301 Morea Road
Frackville, PA 17932

Ge
n

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR237-JW</u>	Date Filed <u>09/22/2020</u>	OTN/LiveScan Number <u>U.9158483</u>	Complaint/Incident Number <u>OCC-20-0023</u>	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>08/03/1959</u>	POB	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA				

RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" 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 checked="" 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)
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	
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" 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. 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).

HEATHER CASTELLINO

(Name of the attorney for the Commonwealth)

Approved via Phone
(Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, KATHRYN GRADY

(Name of the Affiant)

590

(PSP/IMPOETC - 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 [301] Harrisburg City
(Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020



POLICE CRIMINAL COMPLAINT

Docket Number: CR-237-20	Date Filed: 9/21/20	OTN/LiveScan Number: U915848-3	Complaint/Incident Number: OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	3921	A	of the	18 PA C.S.A.	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): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: To that the Defendant, a person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. To Wit: Wendy Danfora, Markal Munford, and others falsley filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and others, although they did not qualify for the benefits. Keith Corprew provided his Date of Birth and Social Security Number for the benefit program, to which \$10,520 was obtained.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	3921	A	of the	18 PA C.S.A.	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): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill and York, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. 6903. To Wit: Keith Corprew provided his Date of Birth and Social Security Number for the benefit program, to which \$10,520 was obtained.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	3922	A2	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
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford, and others falsley filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. Keith Corprew provided his Date of Birth and Social Security number for the benefit program, to which \$10,520 was obtained.



POLICE CRIMINAL COMPLAINT

Bucket Number: 201-20	Date Filed: 9/21/20	OTN/LiveScan Number U 915848-3	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	3922	A2	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: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford and others falsely filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. Keith Corprew provided his Date of Birth and Social Security Number for the benefit program, to which \$10,520 was obtained.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>		3925	A	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): RECEIVING STOLEN PROPERTY

Acts of the accused associated with this Offense: In that the Defendant, Wendy Danfora, is guilty of theft if she intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. To Wit: Wendy Danfora, Markal Munford, and others falsely filed for Pandemic Unemployment Assistance benefits program through the Pennsylvania Labor and Industry website for herself and multiple other individuals, although they did not qualify for the Pandemic Unemployment Assistance benefits. Keith Corprew provided his Date of Birth and Social Security Number for the benefit program, to which \$10,520 was obtained.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				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: <u>CR-237-20</u>	Date Filed: <u>9/21/20</u>	OTN/LiveScan Number <u>U 915848-3</u>	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

- 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.

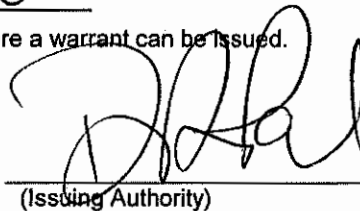
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

9/21/20


(Signature of Affiant)

(Date) _____ (Year) _____
AND NOW, on this date 9/21/2020 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.


(Issuing Authority)

12304
(Magisterial District Court Number)



**POLICE CRIMINAL COMPLAINT**

Docket Number: <i>CR-20-0023</i>	Date Filed: <i>9/2/20</i>	OTN/LiveScan Number <i>U 915848-3</i>	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Kathryn Grady of the Pennsylvania Office of Attorney General (OAG),
being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Kathryn Grady, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation, and is empowered by law to conduct investigations and make arrests relating to white-collar crimes, theft, fraud, and other violations of Pennsylvania Law. Your Affiant currently holds the designation of "Certified Fraud Examiner" and has conducted numerous investigations involving financial crimes. Your Affiant has received training in electronic surveillance by the Pennsylvania State Police in accordance with the Pennsylvania Wiretapping and electronic Surveillance Control Act. This training resulted in the issuance of a class "A" certification, authorizing your Affiant to conduct criminal investigations using various wiretapping equipment, as authorized by Chapter 57 of the Pennsylvania Crimes Code. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5948. Your Affiant has been so employed since January 2018 and is currently assigned to the Financial Crime Section in Harrisburg, Pennsylvania. Prior to employment with the Pennsylvania Office of Attorney General, your Affiant was employed as a Security Investigator at First National Bank of Pennsylvania (formerly Metro Bank) and conducted fraud investigations with the Pennsylvania Office of Inspector General.

Based upon your Affiant's law enforcement experience and training, your Affiant is familiar with the manner in which various crimes are committed in the Commonwealth relating to public corruption, white collar crimes, theft and fraud. Based upon the foregoing training and experience, your Affiant has special expertise regarding the practices of, and techniques used by, these offenders:

II. BACKGROUND OF INVESTIGATION

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program

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called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry, located at 651 Boast Street, Harrisburg, PA 17121, administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: "Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

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III. INVESTIGATION

Agent Grady received information from the Pennsylvania Department of Corrections (DOC), relating to an internal investigation they conducted where it was determined Markal Munford, an inmate at State Correctional Institute (SCI) Mahanoy, located at 301 Morea Rd, Frackville, PA 17932, was providing the names and personal identification of fellow inmates to Wendy Danfora. According to the information received from DOC, Munford instructed Danfora to use the information to file for PUA benefits on the behalf of himself and other inmates. DOC provided Agent Grady copies of the communications between Munford and Danfora.

Agent Grady reviewed these documents and learned between June and August 2020, Munford and Danfora communicated through letters, telephone calls, and electronic messages in reference to the filing of PUA benefits on behalf of inmates. In these communications Munford provided Danfora instructions on who to file applications for, how to file them, and how to move the money once she received the checks or debit cards in the mail. During many of the communications, there were issues between Munford and Danfora due to the slow pace in which Danfora filed these applications. Munford had concerns with how Danfora was handling the payout of the claims since it seemed she was slow to forward the money to the named applicant. Danfora indicated at times that she was struggling to cash checks and transfer money to other parties via Cash App. Danfora often stated she was having issues with the websites when trying to deposit the checks or move money. Danfora would tell Munford that she used Wal-Mart to send money as instructed. An outline of these communications has been provided below.

A. TELEPHONE COMMUNICATIONS

Agent Grady reviewed approximately 130 telephone conversations between Munford and Danfora that took place between May 16, 2020 and September 15, 2020. Below are details from some of their conversations



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relevant to this investigation. In three of these telephone calls, Munford provided Danfora the personal identifying information for inmates Keith Corprew, Frederick Owens, Naseer Moultrie, and Rahim Johnson. Munford told Danfora on several phone calls that he mailed her a letter with instructions on how to handle the information he has provided her. On several of the phone calls, Danfora told Munford that she has filed applications for his father, Mark Munford, her mother, Donna Essis, and her brother, Waide Danfora. Below are examples of these telephone conversations had between Munford and Danfora.

1. On June 23, 2020 at 7:33, Munford and Danfora spoke via telephone. Danfora stated one of the plastic was sent back due to an issue with the mailing address, but that she called and answered the security questions correctly so they will be sending her a new one. Danfora asked Munford for the identifying information for the other two that she did to set them up with an account. Munford asked whose information he needed to get for her. Danfora said for "F" and "N". Danfora wanted the information in case they received paper. Munford stated she needs to watch the mail for his letter and that he has more people for her to handle. Munford told Danfora once they see the paper; they are going to start flooding it.
2. On June 26, 2020 at 14:00, Munford and Danfora spoke via telephone. Danfora said she received his letter today. Munford asked if she was going to be able to handle what he sent her, to which Danfora said yes. Danfora confirmed she completed filings for "K", "N", and "F". Munford asked if she filed for "R". Danfora said she must have missed that one and to send her the information. Munford told her there should have been information for an "R" and a "J" before she filed his information. Danfora said she has only done three and his application. Munford told Danfora she has to be on it better because there are hipsters there and they are going through things quickly. Danfora explained how the weekly claim filings worked and told him that she has to do 11 of them every Sunday. Once she files, then the cards are normally funded by Thursday.

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3. On July 3, 2020 at 20:01, Munford and Danfora spoke via telephone. During this call, Munford said she needed to send money to Dee and to Keisha then send money to Keith or she needed to send money directly to Keith. Danfora said she set herself up with an online "john" at Wells. Munford said she also needed to go to the casino to exchange the bills, but not to go to crazy.
4. On July 4, 2020 at 9:03, Munford and Danfora spoke via telephone. Danfora told Munford said she is going to send the JPays now. She said she is going to send 3 to "K", 3 to "F", and 1 to him.

B. GTL (ELECTRONIC MESSAGES)

Between June 23, 2020 and August 13, 2020, there are approximately 50 GTL messages between Danfora and Munford. These electronic messages correspond with the telephone communications between the two parties. There are messages that contain the personal identifying information of Munford, Frederick Owens, Ramon Rios-Davila, Rahim Johnson, Christopher Mendoza, Sean Brown, Desuan Watson, and Whitney Wilson Heaps. Agent Grady read numerous messages between Munford and Danfora, in which Munford continued to question how Danfora was handling the filing of applications and the movement of money to the applicants. Munford was not a only providing pressure for more clear answers in his telephone calls with Danfora, but was applying the same pressure in his GTL messages.

In a message dated June 24, 2020, Munford wrote to Danfora "...I told u I'm tryna do 100 at least so let me kno your plans I already told u mine. Like what u going do wit all that? I'm listening to u maybe u have better plans then me? We have to talk about this as a team feel me talk to me more about what's going on. S I ain't tryna make this all about hat but u kno I need to kno these things its kind of important we kind of major and niggas be on my ass bought what they suppose to get."

C. LETTER CORRESPONDENCE

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In one communication, post marked June 24, 2020, Munford directs Danfora to “adjust the weeks or make it seem as tho the people I give you stoped working back when the pandemic started” in order to maximize the payments from PA Department of Labor. This letter indicates Munford has to send each person \$300 per their application. Munford instructed Danfora to go to Wal-Mart or CVS to use the money and to use different names for the cards.

In a letter postmarked July 9, 2020, Munford directed Danfora to use a “burner” telephone and public wi-fi connections near a hotel or mall when filing the PUA applications. [A burner telephone is a temporary, pre-paid telephone that can be purchased without a contract from a wireless service provider and could be discarded after a single use.] Within the communications, Munford provided the names, dates of birth, and social security numbers of Keith Richard Corprew, Frederick Owens, Rahim Johnson, Parisha Dayshon Parker, Whitney Wilson Heaps, Adrin Smack, Naseer Moultrie, Jonathan Grant Jackson Sr., Desuan Watson, Christopher Mendoza, Sean Brown, Raymond Painter, and Ramon Rios Davilla to Danfora for the purpose of filing PUA benefits. Munford instructed Danfora how to attempt to disguise her IP address, residence, and the transfer of funds from the PUA check or debit card payments issued after filing and being approved for benefits.

IV. FRAUDULENT CLAIMS

Agent Grady used the intelligence provided by Department of Corrections to investigate the claims of fraudulent Pandemic Unemployment Assistance (PUA) applications filed with the PA Department of Labor and Industry (PA DOL). Agent Grady provided the PA DOL with the personal identifying information of Munford, Danfora, and the inmates listed in the letters and messages, and telephone calls provided by DOC. As a result, PA DOL identified PUA applications for these individuals. A list of the fraudulent applications filed based on the DOC intelligence is listed in Table 1.

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Agent Grady received the application and payment information from the PA DOL regarding the claims filed on behalf of the identified inmates. PA DOL records show Keith Corprew aka Godwin Holiday was issued two checks for \$5,940 and \$3,150 and Frederick Owens was issued two checks for \$5,940 and \$2,450. As of September 18, 2020, these checks have not been cashed. The claimants received US Bank debit cards from the Pennsylvania Department of Treasury (Treasury). Agent Grady received the last four digits of the debit card(s) issued to the claimants. These records show that applications and payments for PUA were submitted between June 15, 2020 and July 7, 2020.

TABLE 1

Date of Application	Name of Applicant	Mailing Address	IP Address	Date of Incarceration	Last 4 of Debit Card	Total Funds Received
06/15/2020	Keith Corprew AKA Godwin Holliday	941 S Pine Street, York, PA 17403	99.203.81.117	10/21/2014	2491	\$10,520
06/18/2020	Nasseer Moultrie	941 S Pine Street, York, PA 17403	174.49.223.240	6/19/2019	8338	\$9,820
06/18/2020	Frederick Owens	941 S Pine Street, York, PA 17403	174.49.223.240	1/10/2017	6933	\$9,820
07/02/2020	Markal Munford	941 S Pine Street, York, PA 17403	174.49.223.240	2/12/2015	0586	\$12,125
07/07/2020	Jonathan Jackson	512 S Duke Street, York, PA 17403	12.216.248.130	1/22/2019	6144	\$0
07/07/2020	Desuan Watson	512 S Duke Street, York, PA 17403	12.216.248.130	9/6/2019	1722	\$0
07/07/2020	Adrin Smack	512 S Duke Street, York, PA 17403	12.216.248.130	12/12/2018	2969	\$0

PA DOL confirmed there were no applications on record for Christopher Mendoza, Whitney Heaps, and Rahim Johnson. PA DOL did identify filings for Parisha Parker, Whitney Heaps, Sean Brown, Raymond Painter, and Ramon Rios-Davilla, however; based on the IP addresses and information used on the applications, it appears these were filed by another party and were not included in this investigation.

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Agent Grady contacted DOC and confirmed the above individuals were incarcerated at the time of their applications and are still incarcerated at SCI Mahanoy as of September 18, 2020, with the exception of Adrin Smack. According to DOC, Smack was transferred to a correctional facility in Delaware on July 21, 2020. Agent Grady confirmed with PA DOL that the US Bank debit cards issued to Munford, Owens, Corprew, and Moultrie were mailed to 941 S Pine Street, York, PA 17403. The US Bank debit cards issued to Smack, Watson, and Jackson were mailed to 512 S Duke Street, York, PA 17403; however, these cards were not funded. As a part of this investigation, Agent Grady determined the current address for Wendy Danfora is 941 S Pine Street, York, PA 17403. Pennsylvania Department of Transportation also listed Danfora's address as 941 S Pine Street, York, PA 17403, which was recently issued on June 6, 2020.

DOC provided Agent Grady with the JPay (an online system in which inmates can receive money from friends and family while incarcerated) transactions of the above listed individuals. According to these records, Danfora sent payments to the below inmates [Table 2] using the JPay system.

TABLE 2					
Inmate Name	Payment Date	Payment Amount	JPAY Customer	Type of Payment	IP Address
Keith Corprew AKA Godwin Holliday	07/07/2020	\$200	Wendy R. Danfora	Credit Card	12.216.248.130
Markal Munford	07/07/2020	\$100	Wendy R. Danfora	Credit Card	12.216.248.130
Desaun Watson	07/10/2020	\$20	Wendy R. Danfora	Credit Card	174.49.223.240
Jonathan Jackson	07/10/2020	\$45	Wendy R. Danfora	Credit Card	174.49.223.240
Frederick Owens	07/23/2020	\$300	Wendy R. Danfora	Credit Card	99.203.202.74

Agent Grady reviewed the records provided by DOC and PA Department of Labor, which show there is a correlation between the IP Addresses used to submit applications and the submission of payments made to above listed inmate's JPay accounts. The records provided by PA Department of Labor show, an individual using IP Addresses 99.203.81.117, 174.49.223.240, and 12.216.248.130 submitted the applications. The DOC JPay records

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reflect an additional IP address of 99.203.202.74 was used for the payment involving Frederick Owens. Agent Grady conducted a search and determined that IP address 174.49.223.240 is owned by Comcast Cable Communications with a geographic location of York, Pennsylvania. Agent Grady obtained the Subscriber information from Comcast Cable Communications, which identified the subscriber of IP Address 174.49.223.240 as being Wendy Danfora located at 941 S Pine Street, York, PA 17404. According to Comcast Cable, the account is active as of September 8, 2020. IP addresses 99.203.81.117 and 99.203.202.74 were identified as being owned by Sprint Relay POP with a geographic location of Elkridge, Maryland. IP address 12.216.248.130 was identified as being owned by Hampton Inn Shrewsbury with a geographic location of New Freedom, PA. Agent Grady verified Danfora was a guest at the Hampton Inn Shrewsbury between July 6, 2020 and July 8, 2020. According to Matthew Wood, General Manager, only guests may access the internet, including wi-fi connection, for the Hampton Inn. Wood provided a copy of the invoice and billing information from Danfora's stay. The billing information indicates Chase Bank Prepaid Master Card ending in 7290 was used to pay for the stay. Wood indicated the records show the card was present for the transaction and that Danfora had to swipe the card herself on their payment kiosk during check-in.

Agent Grady identified additional fraudulent PUA claim filings. The PA Department of Labor and Industry provided additional records which correlate with the data provided in Tables 1 and 2. PA Department of Labor and Industry ran a report to identify PUA applications and weekly reporting that were filed using IP Address 174.49.223.240, which according to Comcast Cable records belongs to Wendy Danfora. The below listed individuals [Table 3] were identified as having fraudulent PUA claim filings and receiving funds from the program. Agent Grady heard on the telephone calls provided by DOC that Danfora informed Munford that she has been filing claims for other people, besides the names that he has provided her. Specifically, on June 26, 2020, Danfora told Munford that she files 11 weekly claims every Sunday. On June 12, 2020, Danfora informed

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Munford that she has filed applications for Donna Essis (Danfora's mother), and Waide Danfora (Danfora's brother). Waide Danfora has been incarcerated at York County Prison since January 24, 2020. On June 23, 2020, Danfora informed Munford that she was filing an application for Mark Munford, his father. PA Department of Labor and Industry confirmed the individuals listed in Table 3 did not qualify for the PUA benefits.

TABLE 3

Date of Application	Name of Applicant	Mailing Address	Registration IP Address	E-Mail Address	Last 4 of Debit Card	Total Funds Received
5/18/2020	Wendy Danfora	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	8106 and 3339	\$10,649
5/20/2020	Jonathan Navarro	713 N Franklin Street, York, PA 17404	99.203.203.18	Lordanu33@gmail.com	6139 and 9567	\$5,589
5/26/2020	Sierra Lewis	941 S Pine Street, York, PA 17404	174.49.223.240	Babers7291988@gmail.com	5430	\$16,290
5/31/2020	Donna Essis	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	2715	\$2,860
6/10/2020	Waide Danfora	941 S Pine Street, York, PA 17404	99.203.203.221	Wendyd912@gmail.com	7833	\$0
6/17/2020	Dorita Payne	132 S Poplar Street, Elizabethtown, PA 17022	174.49.223.240	Wendyd912@gmail.com	9656	
6/17/2020	Louis Grimes	731 S Pine Street, York, PA 17403	174.198.205.203	Lgrimes887@gmail.com	1805 and 8028	\$12,369
6/23/2020	Mark Munford	941 S Pine Street, York, PA 17403	99.203.203.2	marmmm@gmail.com	6148	\$0
6/29/2020	Shaylyn West	941 S Pine Street, York, PA 17403	12.216.248.130	Shay2020@gmail.com	1700	\$0
7/1/2020	Alicia Bethune	512 S Duke Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	6894 and 9041	\$12,125
7/2/2020	Anna Bethune	45 W Jackson Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	4020	\$13,380
7/2/2020	Christopher Simmons	512 S Duke Street, York, PA 17403	174.49.223.240	Chrisss2020@gmail.com	9358	\$11,075
7/7/2020	Akai Rosario	132 S Poplar Street, Elizabethtown, PA 17022	12.216.248.130	mommomkai@yahoo.com	2721	\$15,858



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

Agent Grady received records from US Bank on September 17, 2020 in reference to the individuals listed in Table 1. Included in those records is the full debit card number issued by US Bank for each individual claim, the transaction history, and the IP Address history for any phone calls or online verifications made by the recipient of the debit card. An analysis of these records reflects the use of IP Address 174.49.223.240 being used for the debit cards issued to Keith Corprew, Frederick Owens, Naseer Moultrie, Markal Munford and Jonathan Jackson. The IP Address was used during the process to activate the card, which including establishing a pin number. The debit cards for Desuan Watson and Adrin Smack were de-activated after the claims were flagged by PA DOL. The subscriber of IP Address 174.49.223.240 was identified as Wendy Danfora. The transaction data for each debit card is as follows.

A. Keith Corprew aka Holliday Godwin US Bank Debit Card 4912881024972491

Debit Card ending in 2491, issued to Corprew was activated on 6/26/2020. The card was funded with PUA benefits on 6/24/2020 and 7/1/2020 for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA, and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Turkey Hill in York, PA, and Walgreens in York, PA. The card has a zero balance.

B. Frederick Owens US Bank Debit Card 4912881025286933

Debit Card ending in 6933, issued to Owens was activated on 6/26/2020. The card was funded with PUA benefits on 6/26/2020 and 7/1/2020, for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Sheetz, and Rutter's, located in York, PA. The card has a balance of \$0.53.

**POLICE CRIMINAL COMPLAINT**

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C. Naseer Moultrie US Bank Debit Card 4912881025338338

Debit Card ending in 8338, issued to Moultrie was activated on 6/26/2020. The card was funded with PUA benefits on 6/23/2020, 6/26/2020, and 7/1/2020, for a total of \$9,820. After the deposits, CASH withdrawals were made at ATMs located at Woodforest National Bank 1000 Town Center Dr., York, PA; 720 Bow Creek Rd (Hollywood Casino), Grantville, PA; M&T Bank located at 1520 Penna Ave and 912 S Richland in York, PA; and PNC Bank located at 2068 Queen Street and 405 Memory Lane in York, PA. There were POS transactions at Wal-Mart, McDonalds, Sheetz, Giant, Auntie Anne's, Justice, GTL Inmate Phone, Five Below, Turkey Hill, Burger King, Hershey Lodge, Golden Beauty School, Sheetz, Dollar General, Higher Design, Chipotle, Rutter's, Taco Bell, and Shoe Department. The card has a zero balance.

D. Adrin Smack US Bank Debit Card 4912881029872969

Debit Card ending in 2969, issued to Smack, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

E. Desuan Watson US Bank Debit Card 4912881029871722

Debit Card ending in 1722, issued to Watson, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

F. Jonathan Jackson US Bank Debit Card 4912881029866144

Debit Card ending in 6144, issued to Jackson, was activated on 7/21/2020. The debit card did not receive funding from PUA benefit claims.

G. Markal Munford US Bank Debit Card 4912881029190586

Debit Card ending in 0586, issued to Munford, was activated on 7/23/2020. The debit card was funded on 7/10/2020, 7/15/2020, and 7/18/2020, for a total of \$11,950. After the deposits, CASH withdrawals

**POLICE CRIMINAL COMPLAINT**

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Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

were made at PNC Banks located at 405 Memory Lane, York, PA, 2068 S Queen Street, York, PA, 215 Arsenal Road, York, PA and 1180 Manheim Pike, Lancaster, PA; and Wells Fargo Bank located at 2099 S Queen Street, York, PA. There were also POS transactions at Sheetz, Auntie Anne's, Dollar General, Wal-Mart, McDonald's, Bath and Body Works, H&M, Coca Cola, Boscov's, Wendy's, Turkey Hill, Five Below, Texas Roadhouse, GTL Inmate Phone, I Heart ICE-SQ, Roll R Way, Save A Lot, Chick-Fil-A, Double Tree Resort Lancaster, Lowe's, and Starbucks. The card has a zero balance.

Agent Grady conducted interviews at SCI Mahanoy with the inmates listed in Table 1. As a result of these interviews, two inmates informed Agent Grady that Markal Munford, also known as "Kellz", was actively talking about using the information of fellow inmates to file PUA applications through the PA DOL website. Munford indicated he had someone on the outside that was able to complete the filings on their behalf. One of these inmates admitted they had provided Munford their information, but claimed he did not know he was going to be using it to file a PUA application on his behalf. The inmate stated Munford claimed he needed the information to help him obtain employment upon his release from prison. The inmate explained he had received \$200 on his JPay from a Wendy Danfora, but did not know who that was. The inmate questioned Munford to see if he knew where the \$200 came from, but Munford did not confirm or deny why he had received the funds. Munford told the inmate to consider it a blessing that he received the funds on his JPay account.

V. CONCLUSION

Based on the facts and circumstances of this investigation, and your Affiant training and experience involving thefts and white collar crime investigations, your Affiant believes that Wendy Danfora and Markal Munford conspired together to benefit financially from the fraudulent Pandemic Unemployment Assistance benefit program operated by Pennsylvania Department of Labor and Industry, located at 651 Boas Street,

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

Harrisburg, PA 17121. The investigation, which included records provided by the PA DOL, Department of Corrections, Pennsylvania Treasury, and documentation obtained via Search Warrant, revealed Danfora filed 20 fraudulent PUA claims, to include her own, for persons that were not eligible for the PUA program based on the requirements set forth in Cares Act. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires, the acknowledgement that any false statements made on the application is a criminal offense.

The investigation also revealed attempts made by Danfora and Munford to conceal the source of the funds before adding money to the JPay accounts of the inmates whose names were used to file the applications. Munford and Danfora conspired to conceal the money by using cash withdrawals, prepaid cards, and the exchange of cash at casinos to avoid detection. The theft of funds from this activity total approximately \$153,470.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of their knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendants Wendy Danfora, Markal Munford, Frederick Owens, and Keith Corprew.

I, KATHRYN GRADY, 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.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW

Harrisburg, PA 17121. The investigation, which included records provided by the PA DOL, Department of Corrections, Pennsylvania Treasury, and documentation obtained via Search Warrant, revealed Danfora filed 20 fraudulent PUA claims, to include her own, for persons that were not eligible for the PUA program based on the requirements set forth in Cares Act. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires, the acknowledgement that any false statements made on the application is a criminal offense.

The investigation also revealed attempts made by Danfora and Munford to conceal the source of the funds before adding money to the JPay accounts of the inmates whose names were used to file the applications. Munford and Danfora conspired to conceal the money by using cash withdrawals, prepaid cards, and the exchange of cash at casinos to avoid detection. The theft of funds from this activity total approximately \$153,470.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of their knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendants Wendy Danfora, Markal Munford, Frederick Owens, and Keith Corprew.

I, KATHRYN GRADY, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CL-23720</u>	Date Filed: <u>9/21/20</u>	DTN/LiveScan Number: <u>U 9158483</u>	Complaint/Incident Number: <u>OCC-20-0023</u>
Defendant Name:	First: <u>KEITH</u>	Middle: <u>R</u>	Last: <u>CORPREW</u>

K. Shady

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

September 2020

9/21/20

Date

[Signature]

, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic Pellino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

WENDY

R

DANFORA

First Name

Middle Name

Last Name

941 S Pine Street
York, PA 17404

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CL-241-2020</u>	Date Filed <u>09/22/2020</u>	OTN/LiveScan Number <u>U9158882-2</u>	Complaint/Incident Number <u>OCC-20-0023</u>	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB <u>9/12/1987</u>	POB	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input checked="" 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"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" 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	

Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" 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. 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).

HEATHER CASTELLINO

(Name of the attorney for the Commonwealth)

Approved via Phone
(Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, KATHRYN GRADY

(Name of the Affiant)

590

(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 [301] Harrisburg City
(Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older
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<input checked="" type="checkbox"/>	1	911	B3	of the	18 PA C.S.A.	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
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: The Defendant did, being employed by or associated with an enterprise, did between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill, and York, Pennsylvania and elsewhere, conduct or participate, directly or indirectly in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein. Defendant was associated with an enterprise constituting a group of individuals associated in fact, although not a legal entity, engaged in commerce and consisting of Wendy Danfora, Markal Munford, and others, and Defendant did conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 PA.C.S. §911(h) consisting of: [SEE ATTACHED OFFENSE CONTINUATION PAGE]

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older
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<input type="checkbox"/>	2	911	B4	of the	18 PA C.S.A.	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
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Statute Description (include the name of statute or ordinance): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: In that the Defendant, did between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill, and York County, Pennsylvania and elsewhere, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. §911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Markal Munford and other individuals, while employed or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as define in 18 PA.C.S.A. §911(h), in violation of Section 911(b)(4) of the Crimes Codes, 18 Pa.C.S.A. §911(b)(4).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older
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<input type="checkbox"/>	3	3921	A	of the	18 PA C.S.A.	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
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Statute Description (include the name of statute or ordinance): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: To that the Defendant, a person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. To Wit: Wendy Danfora, Markal Munford, and others falsley filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and others, although they did not qualify for the benefits. Approximately \$153,470 in benefits were paid out as a result of fraudulent filings.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	3921	A	of the	18 PA C.S.A.	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): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill and York, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. 903. To Wit: Wendy Danfora, Markal Munford, and others falsely filed applications for the Pandemic Unemployment Assistance benefit program.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	3922	A2	of the	18 PA C.S.A.	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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford, and others falsely filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. On each application, the applicant must certify the information they provided are true and correct. The fraudulent filings totaled approximately \$153,470.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	3922	A2	of the	18 PA C.S.A.	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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford and others falsely filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. The fraudulent filings totaled approximately \$153,470.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older
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<input type="checkbox"/>	7	3925		of the	18 PA C.S.A.	2	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant, Wendy Danfora, is guilty of theft if she intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. To Wit: Wendy Danfora, Markal Munford, and others falsely filed for Pandemic Unemployment Assistance benefits program through the Pennsylvania Labor and Industry website for herself and multiple other individuals, although they did not qualify for the Pandemic Unemployment Assistance benefits. The fraudulent applications totaled approximately \$153,470.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older
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<input type="checkbox"/>	8	4106	A(1)(iii)	of the	18 PA C.S.A.	2	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): **ACCESS DEVICE FRAUD**

Acts of the accused associated with this Offense: To that the Defendant did on or about the above mentioned date, time, and location, used an access device to obtain or in an attempt to obtain property or services with knowledge for any other reason his use of the access device has been revoked or canceled. To Wit: Wendy Danfora, Markal Munford, and others knew the Pandemic Unemployment Assistance benefits would be paid on a debit card issued by US Bank for the purpose of receiving the program benefits. The debit card was sent to and activated by Danfora, not the applicant.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older
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<input type="checkbox"/>	9	4106	A2	of the	18 PA C.S.A.	2	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): **ACCESS DEVICE FRAUD**

Acts of the accused associated with this Offense: To that the Defendant did on or about the above mentioned date, time, and location, publishes, makes, sells, gives, or otherwise transfer to another, or offers or advertises, or aids and abets any other person to use an access device knowing that the access device is counterfeit, altered or incomplete, belongs to another person who has not authorized its use, has been revoked or canceled or for any reason is unauthorized by the issuer or the device holder. To Wit: Wendy Danfora, Markal Munford, and others knew the Pandemic Unemployment Assistance benefits would be paid on a debit card issued by US Bank for the purpose of receiving the program benefits. The debit card was sent to and activated by Danfora, not the applicant.



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Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	10	4106	A3	of the	18 PA C.S.A.	2	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): **ACCESS DEVICE FRAUD**

Acts of the accused associated with this Offense: To that the Defendant did on or about the above mentioned date, time, and location, possess an access device knowing that it is counterfeit, altered, incomplete or belongs to another person who has not authorized its possession. To Wit: Wendy Danfora, Markal Munford, and others knew the Pandemic Unemployment Assistance benefits would be paid on a debit card issued by US Bank for the purpose of receiving the program benefits. The debit card was sent to and activated by Danfora, not the applicant.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	11	7512	A	of the	18 PA.C.S.A.	2	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 COMMUNICATION FACILITY**

Acts of the accused associated with this Offense: To that the Defendant, uses a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony under this title or under the act of April 14, 1972 (P.L.233, No.64), known as the Control Substance Drug, Device and Cosmetic Act. To Wit: Wendy Danfora and Markal Munford utilized electronic communications through the Department of Corrections SCI Mahanoy telephone communications and e-mail systems, which provided the personal identification information for Markal Munford and 6 other inmates. All applications filed for the Pandemic Unemployment Assistance were filed through the PA Department of Labor and Industry Website.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	12	4911	A1	of the	18 PA.C.S.A.	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**

Acts of the accused associated with this Offense: To that the Defendant, knowingly 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; To Wit: Wendy Danfora filed 20 false Pandemic Unemployment Assistance benefit program applications for herself and others through the PA Department of Labor website. Danfora falsely acknowledged at the time of the original application and at the time of each weekly re-certification in order to obtain additional benefits.



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Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	13	4904	B	of the	18 PA.C.S.A.	20	M3		
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): **UNSWORN FALSIFICATION TO AUTHORITIES**

Acts of the accused associated with this Offense: To that the Defendant, makes a written false staement which they do not believe to be true, on or pursuant to a form bearing notice, authorized by law, to the effect that false statements made therein are punishable. To Wit: Wendy Danfora, Markal Munford, and others knowingly submitted applications to the PA Department of Labor and Industry Pandemic Unemployment Assistance benefit program for which they were not eligible.

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

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				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
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Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT
OFFENSE CONTINUATION PAGE

Docket Number:	Date Filed: 09/22/2020	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

OFFENSE DESCRIPTION CONTINUATION

Offense # 1: CORRUPT ORGANIZATIONS:

- A. Multiple acts of Criminal Conspiracy to commit violations of the Chapter 39 of the Pennsylvania Crimes Code, 18 Pa.C.S.A. §903,
- B. Multiple acts of violation of the Chapter 49 of the Pennsylvania Crimes Code, including 18 Pa.C.S.A. §4911,
- C. Multiple acts of violation of Chapter 39 of the Pennsylvania Crimes Code, including 18 Pa.C.S.A §3921 and 18 Pa C.S.A. §3922;

in violation of Section 911(b)(3) of the Crimes Code, 18 PA.C.S.A. §911(b)(3).



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-241-2020</u>	Date Filed: <u>9/21/20</u>	OTN/LiveScan Number <u>0915882-2</u>	Complaint/Incident Number <u>OCC-20-0023</u>
Defendant Name:	First: <u>WENDY</u>	Middle: <u>R</u>	Last: <u>DANFORA</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 that non-confidential information and documents.

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

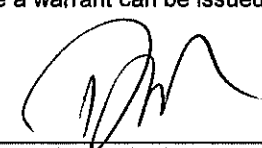
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

9/22/20


(Signature of Affiant)

(Date) _____ (Year) _____
AND NOW, on this date 9/21/2020 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.

12-3-04
(Magisterial District Court Number)


(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number: OL-241-7070	Date Filed: 9/21/20	OTN/LiveScan Number U915882-2	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Kathryn Grady of the Pennsylvania Office of Attorney General (OAG),
being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Kathryn Grady, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation, and is empowered by law to conduct investigations and make arrests relating to white-collar crimes, theft, fraud, and other violations of Pennsylvania Law. Your Affiant currently holds the designation of "Certified Fraud Examiner" and has conducted numerous investigations involving financial crimes. Your Affiant has received training in electronic surveillance by the Pennsylvania State Police in accordance with the Pennsylvania Wiretapping and electronic Surveillance Control Act. This training resulted in the issuance of a class "A" certification, authorizing your Affiant to conduct criminal investigations using various wiretapping equipment, as authorized by Chapter 57 of the Pennsylvania Crimes Code. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5948. Your Affiant has been so employed since January 2018 and is currently assigned to the Financial Crime Section in Harrisburg, Pennsylvania. Prior to employment with the Pennsylvania Office of Attorney General, your Affiant was employed as a Security Investigator at First National Bank of Pennsylvania (formerly Metro Bank) and conducted fraud investigations with the Pennsylvania Office of Inspector General.

Based upon your Affiant's law enforcement experience and training, your Affiant is familiar with the manner in which various crimes are committed in the Commonwealth relating to public corruption, white collar crimes, theft and fraud. Based upon the foregoing training and experience, your Affiant has special expertise regarding the practices of, and techniques used by, these offenders.

II. BACKGROUND OF INVESTIGATION

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program



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called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry, located at 651 Boast Street, Harrisburg, PA 17121, administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: "Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

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III. INVESTIGATION

Agent Grady received information from the Pennsylvania Department of Corrections (DOC), relating to an internal investigation they conducted where it was determined Markal Munford, an inmate at State Correctional Institute (SCI) Mahanoy, located at 301 Morea Rd, Frackville, PA 17932, was providing the names and personal identification of fellow inmates to Wendy Danfora. According to the information received from DOC, Munford instructed Danfora to use the information to file for PUA benefits on the behalf of himself and other inmates. DOC provided Agent Grady copies of the communications between Munford and Danfora.

Agent Grady reviewed these documents and learned between June and August 2020, Munford and Danfora communicated through letters, telephone calls, and electronic messages in reference to the filing of PUA benefits on behalf of inmates. In these communications Munford provided Danfora instructions on who to file applications for, how to file them, and how to move the money once she received the checks or debit cards in the mail. During many of the communications, there were issues between Munford and Danfora due to the slow pace in which Danfora filed these applications. Munford had concerns with how Danfora was handling the payout of the claims since it seemed she was slow to forward the money to the named applicant. Danfora indicated at times that she was struggling to cash checks and transfer money to other parties via Cash App. Danfora often stated she was having issues with the websites when trying to deposit the checks or move money. Danfora would tell Munford that she used Wal-Mart to send money as instructed. An outline of these communications has been provided below.

A. TELEPHONE COMMUNICATIONS

Agent Grady reviewed approximately 130 telephone conversations between Munford and Danfora that took place between May 16, 2020 and September 15, 2020. Below are details from some of their conversations



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relevant to this investigation. In three of these telephone calls, Munford provided Danfora the personal identifying information for inmates Keith Corprew, Frederick Owens, Naseer Moultrie, and Rahim Johnson. Munford told Danfora on several phone calls that he mailed her a letter with instructions on how to handle the information he has provided her. On several of the phone calls, Danfora told Munford that she has filed applications for his father, Mark Munford, her mother, Donna Essis, and her brother, Waide Danfora. Below are examples of these telephone conversations had between Munford and Danfora.

1. On June 23, 2020 at 7:33, Munford and Danfora spoke via telephone. Danfora stated one of the plastic was sent back due to an issue with the mailing address, but that she called and answered the security questions correctly so they will be sending her a new one. Danfora asked Munford for the identifying information for the other two that she did to set them up with an account. Munford asked whose information he needed to get for her. Danfora said for "F" and "N". Danfora wanted the information in case they received paper. Munford stated she needs to watch the mail for his letter and that he has more people for her to handle. Munford told Danfora once they see the paper; they are going to start flooding it.
2. On June 26, 2020 at 14:00, Munford and Danfora spoke via telephone. Danfora said she received his letter today. Munford asked if she was going to be able to handle what he sent her, to which Danfora said yes. Danfora confirmed she completed filings for "K", "N", and "F". Munford asked if she filed for "R". Danfora said she must have missed that one and to send her the information. Munford told her there should have been information for an "R" and a "J" before she filed his information. Danfora said she has only done three and his application. Munford told Danfora she has to be on it better because there are hipsters there and they are going through things quickly. Danfora explained how the weekly claim filings worked and told him that she has to do 11 of them every Sunday. Once she files, then the cards are normally funded by Thursday.

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3. On July 3, 2020 at 20:01, Munford and Danfora spoke via telephone. During this call, Munford said she needed to send money to Dee and to Keisha then send money to Keith or she needed to send money directly to Keith. Danfora said she set herself up with an online "john" at Wells. Munford said she also needed to go to the casino to exchange the bills, but not to go to crazy.
4. On July 4, 2020 at 9:03, Munford and Danfora spoke via telephone. Danfora told Munford said she is going to send the JPays now. She said she is going to send 3 to "K", 3 to "F", and 1 to him.

B. GTL (ELECTRONIC MESSAGES)

Between June 23, 2020 and August 13, 2020, there are approximately 50 GTL messages between Danfora and Munford. These electronic messages correspond with the telephone communications between the two parties. There are messages that contain the personal identifying information of Munford, Frederick Owens, Ramon Rios-Davila, Rahim Johnson, Christopher Mendoza, Sean Brown, Desuan Watson, and Whitney Wilson Heaps. Agent Grady read numerous messages between Munford and Danfora, in which Munford continued to question how Danfora was handling the filing of applications and the movement of money to the applicants. Munford was not a only providing pressure for more clear answers in his telephone calls with Danfora, but was applying the same pressure in his GTL messages.

In a message dated June 24, 2020, Munford wrote to Danfora "...I told u I'm tryna do 100 at least so let me kno your plans I already told u mine. Like what u going do wit all that? I'm listening to u maybe u have better plans then me? We have to talk about this as a team feel me talk to me more about what's going on. S I ain't tryna make this all about hat but u kno I need to kno these things its kind of important we kind of major and niggas be on my ass bought what they suppose to get."

C. LETTER CORRESPONDENCE

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In one communication, post marked June 24, 2020, Munford directs Danfora to “adjust the weeks or make it seem as tho the people I give you stoped working back when the pandemic started” in order to maximize the payments from PA Department of Labor. This letter indicates Munford has to send each person \$300 per their application. Munford instructed Danfora to go to Wal-Mart or CVS to use the money and to use different names for the cards.

In a letter postmarked July 9, 2020, Munford directed Danfora to use a “burner” telephone and public wi-fi connections near a hotel or mall when filing the PUA applications. [A burner telephone is a temporary, pre-paid telephone that can be purchased without a contract from a wireless service provider and could be discarded after a single use.] Within the communications, Munford provided the names, dates of birth, and social security numbers of Keith Richard Corprew, Frederick Owens, Rahim Johnson, Parisha Dayshon Parker, Whitney Wilson Heaps, Adrin Smack, Naseer Moultrie, Jonathan Grant Jackson Sr., Desuan Watson, Christopher Mendoza, Sean Brown, Raymond Painter, and Ramon Rios Davilla to Danfora for the purpose of filing PUA benefits. Munford instructed Danfora how to attempt to disguise her IP address, residence, and the transfer of funds from the PUA check or debit card payments issued after filing and being approved for benefits.

IV. FRAUDULENT CLAIMS

Agent Grady used the intelligence provided by Department of Corrections to investigate the claims of fraudulent Pandemic Unemployment Assistance (PUA) applications filed with the PA Department of Labor and Industry (PA DOL). Agent Grady provided the PA DOL with the personal identifying information of Munford, Danfora, and the inmates listed in the letters and messages, and telephone calls provided by DOC. As a result, PA DOL identified PUA applications for these individuals. A list of the fraudulent applications filed based on the DOC intelligence is listed in Table 1.

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Agent Grady received the application and payment information from the PA DOL regarding the claims filed on behalf of the identified inmates. PA DOL records show Keith Corprew aka Godwin Holiday was issued two checks for \$5,940 and \$3,150 and Frederick Owens was issued two checks for \$5,940 and \$2,450. As of September 18, 2020, these checks have not been cashed. The claimants received US Bank debit cards from the Pennsylvania Department of Treasury (Treasury). Agent Grady received the last four digits of the debit card(s) issued to the claimants. These records show that applications and payments for PUA were submitted between June 15, 2020 and July 7, 2020.

TABLE 1

Date of Application	Name of Applicant	Mailing Address	IP Address	Date of Incarceration	Last 4 of Debit Card	Total Funds Received
06/15/2020	Keith Corprew AKA Godwin Holliday	941 S Pine Street, York, PA 17403	99.203.81.117	10/21/2014	2491	\$10,520
06/18/2020	Nasseer Moultrie	941 S Pine Street, York, PA 17403	174.49.223.240	6/19/2019	8338	\$9,820
06/18/2020	Frederick Owens	941 S Pine Street, York, PA 17403	174.49.223.240	1/10/2017	6933	\$9,820
07/02/2020	Markal Munford	941 S Pine Street, York, PA 17403	174.49.223.240	2/12/2015	0586	\$12,125
07/07/2020	Jonathan Jackson	512 S Duke Street, York, PA 17403	12.216.248.130	1/22/2019	6144	\$0
07/07/2020	Desuan Watson	512 S Duke Street, York, PA 17403	12.216.248.130	9/6/2019	1722	\$0
07/07/2020	Adrin Smack	512 S Duke Street, York, PA 17403	12.216.248.130	12/12/2018	2969	\$0

PA DOL confirmed there were no applications on record for Christopher Mendoza, Whitney Heaps, and Rahim Johnson. PA DOL did identify filings for Parisha Parker, Whitney Heaps, Sean Brown, Raymond Painter, and Ramon Rios-Davilla, however; based on the IP addresses and information used on the applications, it appears these were filed by another party and were not included in this investigation.

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Agent Grady contacted DOC and confirmed the above individuals were incarcerated at the time of their applications and are still incarcerated at SCI Mahanoy as of September 18, 2020, with the exception of Adrin Smack. According to DOC, Smack was transferred to a correctional facility in Delaware on July 21, 2020. Agent Grady confirmed with PA DOL that the US Bank debit cards issued to Munford, Owens, Corprew, and Moultrie were mailed to 941 S Pine Street, York, PA 17403. The US Bank debit cards issued to Smack, Watson, and Jackson were mailed to 512 S Duke Street, York, PA 17403; however, these cards were not funded. As a part of this investigation, Agent Grady determined the current address for Wendy Danfora is 941 S Pine Street, York, PA 17403. Pennsylvania Department of Transportation also listed Danfora's address as 941 S Pine Street, York, PA 17403, which was recently issued on June 6, 2020.

DOC provided Agent Grady with the JPay (an online system in which inmates can receive money from friends and family while incarcerated) transactions of the above listed individuals. According to these records, Danfora sent payments to the below inmates [Table 2] using the JPay system.

TABLE 2					
Inmate Name	Payment Date	Payment Amount	JPAY Customer	Type of Payment	IP Address
Keith Corprew AKA Godwin Holliday	07/07/2020	\$200	Wendy R. Danfora	Credit Card	12.216.248.130
Markal Munford	07/07/2020	\$100	Wendy R. Danfora	Credit Card	12.216.248.130
Desaun Watson	07/10/2020	\$20	Wendy R. Danfora	Credit Card	174.49.223.240
Jonathan Jackson	07/10/2020	\$45	Wendy R. Danfora	Credit Card	174.49.223.240
Frederick Owens	07/23/2020	\$300	Wendy R. Danfora	Credit Card	99.203.202.74

Agent Grady reviewed the records provided by DOC and PA Department of Labor, which show there is a correlation between the IP Addresses used to submit applications and the submission of payments made to above listed inmate's JPay accounts. The records provided by PA Department of Labor show, an individual using IP Addresses 99.203.81.117, 174.49.223.240, and 12.216.248.130 submitted the applications. The DOC JPay records

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reflect an additional IP address of 99.203.202.74 was used for the payment involving Frederick Owens. Agent Grady conducted a search and determined that IP address 174.49.223.240 is owned by Comcast Cable Communications with a geographic location of York, Pennsylvania. Agent Grady obtained the Subscriber information from Comcast Cable Communications, which identified the subscriber of IP Address 174.49.223.240 as being Wendy Danfora located at 941 S Pine Street, York, PA 17404. According to Comcast Cable, the account is active as of September 8, 2020. IP addresses 99.203.81.117 and 99.203.202.74 were identified as being owned by Sprint Relay POP with a geographic location of Elkridge, Maryland. IP address 12.216.248.130 was identified as being owned by Hampton Inn Shrewsbury with a geographic location of New Freedom, PA. Agent Grady verified Danfora was a guest at the Hampton Inn Shrewsbury between July 6, 2020 and July 8, 2020. According to Matthew Wood, General Manager, only guests may access the internet, including wi-fi connection, for the Hampton Inn. Wood provided a copy of the invoice and billing information from Danfora's stay. The billing information indicates Chase Bank Prepaid Master Card ending in 7290 was used to pay for the stay. Wood indicated the records show the card was present for the transaction and that Danfora had to swipe the card herself on their payment kiosk during check-in.

Agent Grady identified additional fraudulent PUA claim filings. The PA Department of Labor and Industry provided additional records which correlate with the data provided in Tables 1 and 2. PA Department of Labor and Industry ran a report to identify PUA applications and weekly reporting that were filed using IP Address 174.49.223.240, which according to Comcast Cable records belongs to Wendy Danfora. The below listed individuals [Table 3] were identified as having fraudulent PUA claim filings and receiving funds from the program. Agent Grady heard on the telephone calls provided by DOC that Danfora informed Munford that she has been filing claims for other people, besides the names that he has provided her. Specifically, on June 26, 2020, Danfora told Munford that she files 11 weekly claims every Sunday. On June 12, 2020, Danfora informed

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Munford that she has filed applications for Donna Essis (Danfora's mother), and Waide Danfora (Danfora's brother). Waide Danfora has been incarcerated at York County Prison since January 24, 2020. On June 23, 2020, Danfora informed Munford that she was filing an application for Mark Munford, his father. PA Department of Labor and Industry confirmed the individuals listed in Table 3 did not qualify for the PUA benefits.

TABLE 3

Date of Application	Name of Applicant	Mailing Address	Registration IP Address	E-Mail Address	Last 4 of Debit Card	Total Funds Received
5/18/2020	Wendy Danfora	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	8106 and 3339	\$10,649
5/20/2020	Jonathan Navarro	713 N Franklin Street, York, PA 17404	99.203.203.18	Lordanu33@gmail.com	6139 and 9567	\$5,589
5/26/2020	Sierra Lewis	941 S Pine Street, York, PA 17404	174.49.223.240	Babers7291988@gmail.com	5430	\$16,290
5/31/2020	Donna Essis	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	2715	\$2,860
6/10/2020	Waide Danfora	941 S Pine Street, York, PA 17404	99.203.203.221	Wendyd912@gmail.com	7833	\$0
6/17/2020	Dorita Payne	132 S Poplar Street, Elizabethtown, PA 17022	174.49.223.240	Wendyd912@gmail.com	9656	
6/17/2020	Louis Grimes	731 S Pine Street, York, PA 17403	174.198.205.203	Lgrimes887@gmail.com	1805 and 8028	\$12,369
6/23/2020	Mark Munford	941 S Pine Street, York, PA 17403	99.203.203.2	marmmm@gmail.com	6148	\$0
6/29/2020	Shaylyn West	941 S Pine Street, York, PA 17403	12.216.248.130	Shay2020@gmail.com	1700	\$0
7/1/2020	Alicia Bethune	512 S Duke Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	6894 and 9041	\$12,125
7/2/2020	Anna Bethune	45 W Jackson Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	4020	\$13,380
7/2/2020	Christopher Simmons	512 S Duke Street, York, PA 17403	174.49.223.240	Chrisss2020@gmail.com	9358	\$11,075
7/7/2020	Akai Rosario	132 S Poplar Street, Elizabethtown, PA 17022	12.216.248.130	mommomkai@yahoo.com	2721	\$15,858



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

Agent Grady received records from US Bank on September 17, 2020 in reference to the individuals listed in Table 1. Included in those records is the full debit card number issued by US Bank for each individual claim, the transaction history, and the IP Address history for any phone calls or online verifications made by the recipient of the debit card. An analysis of these records reflects the use of IP Address 174.49.223.240 being used for the debit cards issued to Keith Corprew, Frederick Owens, Naseer Moultrie, Markal Munford and Jonathan Jackson. The IP Address was used during the process to activate the card, which including establishing a pin number. The debit cards for Desuan Watson and Adrin Smack were de-activated after the claims were flagged by PA DOL. The subscriber of IP Address 174.49.223.240 was identified as Wendy Danfora. The transaction data for each debit card is as follows.

A. Keith Corprew aka Holliday Godwin US Bank Debit Card 4912881024972491

Debit Card ending in 2491, issued to Corprew was activated on 6/26/2020. The card was funded with PUA benefits on 6/24/2020 and 7/1/2020 for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA, and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Turkey Hill in York, PA, and Walgreens in York, PA. The card has a zero balance.

B. Frederick Owens US Bank Debit Card 4912881025286933

Debit Card ending in 6933, issued to Owens was activated on 6/26/2020. The card was funded with PUA benefits on 6/26/2020 and 7/1/2020, for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Sheetz, and Rutter's, located in York, PA. The card has a balance of \$0.53.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

C. Naseer Moultrie US Bank Debit Card 4912881025338338

Debit Card ending in 8338, issued to Moultrie was activated on 6/26/2020. The card was funded with PUA benefits on 6/23/2020, 6/26/2020, and 7/1/2020, for a total of \$9,820. After the deposits, CASH withdrawals were made at ATMs located at Woodforest National Bank 1000 Town Center Dr., York, PA; 720 Bow Creek Rd (Hollywood Casino), Grantville, PA; M&T Bank located at 1520 Penna Ave and 912 S Richland in York, PA; and PNC Bank located at 2068 Queen Street and 405 Memory Lane in York, PA. There were POS transactions at Wal-Mart, McDonalds, Sheetz, Giant, Auntie Anne's, Justice, GTL Inmate Phone, Five Below, Turkey Hill, Burger King, Hershey Lodge, Golden Beauty School, Sheetz, Dollar General, Higher Design, Chipotle, Rutter's, Taco Bell, and Shoe Department. The card has a zero balance.

D. Adrin Smack US Bank Debit Card 4912881029872969

Debit Card ending in 2969, issued to Smack, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

E. Desuan Watson US Bank Debit Card 4912881029871722

Debit Card ending in 1722, issued to Watson, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

F. Jonathan Jackson US Bank Debit Card 4912881029866144

Debit Card ending in 6144, issued to Jackson, was activated on 7/21/2020. The debit card did not receive funding from PUA benefit claims.

G. Markal Munford US Bank Debit Card 4912881029190586

Debit Card ending in 0586, issued to Munford, was activated on 7/23/2020. The debit card was funded on 7/10/2020, 7/15/2020, and 7/18/2020, for a total of \$11,950. After the deposits, CASH withdrawals

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

were made at PNC Banks located at 405 Memory Lane, York, PA, 2068 S Queen Street, York, PA, 215 Arsenal Road, York, PA and 1180 Manheim Pike, Lancaster, PA; and Wells Fargo Bank located at 2099 S Queen Street, York, PA. There were also POS transactions at Sheetz, Auntie Anne's, Dollar General, Wal-Mart, McDonald's, Bath and Body Works, H&M, Coca Cola, Boscov's, Wendy's, Turkey Hill, Five Below, Texas Roadhouse, GTL Inmate Phone, I Heart ICE-SQ, Roll R Way, Save A Lot, Chick-Fil-A, Double Tree Resort Lancaster, Lowe's, and Starbucks. The card has a zero balance.

Agent Grady conducted interviews at SCI Mahanoy with the inmates listed in Table 1. As a result of these interviews, two inmates informed Agent Grady that Markal Munford, also known as "Kellz", was actively talking about using the information of fellow inmates to file PUA applications through the PA DOL website. Munford indicated he had someone on the outside that was able to complete the filings on their behalf. One of these inmates admitted they had provided Munford their information, but claimed he did not know he was going to be using it to file a PUA application on his behalf. The inmate stated Munford claimed he needed the information to help him obtain employment upon his release from prison. The inmate explained he had received \$200 on his JPay from a Wendy Danfora, but did not know who that was. The inmate questioned Munford to see if he knew where the \$200 came from, but Munford did not confirm or deny why he had received the funds. Munford told the inmate to consider it a blessing that he received the funds on his JPay account.

V. CONCLUSION

Based on the facts and circumstances of this investigation, and your Affiant training and experience involving thefts and white collar crime investigations, your Affiant believes that Wendy Danfora and Markal Munford conspired together to benefit financially from the fraudulent Pandemic Unemployment Assistance benefit program operated by Pennsylvania Department of Labor and Industry, located at 651 Boas Street,

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

Harrisburg, PA 17121. The investigation, which included records provided by the PA DOL, Department of Corrections, Pennsylvania Treasury, and documentation obtained via Search Warrant, revealed Danfora filed 20 fraudulent PUA claims, to include her own, for persons that were not eligible for the PUA program based on the requirements set forth in Cares Act. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires, the acknowledgement that any false statements made on the application is a criminal offense.

The investigation also revealed attempts made by Danfora and Munford to conceal the source of the funds before adding money to the JPay accounts of the inmates whose names were used to file the applications. Munford and Danfora conspired to conceal the money by using cash withdrawals, prepaid cards, and the exchange of cash at casinos to avoid detection. The theft of funds from this activity total approximately \$153,470.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of their knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendants Wendy Danfora, Markal Munford, Frederick Owens, and Keith Corprew.

I, KATHRYN GRADY, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: 02-24F-2020	Date Filed: 9-21-20	OTN/LiveScan Number U915882-2	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle: R	Last: DANFORA

A. Shady

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

September 2020

9-22-20

Date

, Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic A. Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

JOSEPH

E

KLECHA

First Name

Middle Name

Last Name

Ge

SCI Benner Township, 301 Institution Drive,
Bellefonte, PA 16823

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR 257-20</u>	Date Filed <u>9/24/20</u>	OTN/LiveScan Number <u>U915964</u>	Complaint/Incident Number <u>OCC-20-0020</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>05/05/1986</u>	POB <u>Pa</u>	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input type="checkbox"/>
First Name <u>AKA</u>		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 checked="" 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 checked="" type="checkbox"/> BLU (Blue) <input 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 checked="" type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) <u>195</u>
FBI Number	MNU Number	Ft. HEIGHT In. <u>5</u> <u>11</u>
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fingerprint Classification:	

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because:

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

HEATHER A. CASTELLINO, SDAG

(Name of the attorney for the Commonwealth)

Approved via phone
(Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, SPECIAL AGENT CHRISTOPHER WEAVER

BADGE #603

(Name of the Affiant)

(PSP/MPOETC -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 [301] PA Dept Of Labor And Industry,
651 Boas St, Harrisburg, Pa (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MARCH 12, 2020 TO AUGUST 31, 2020



POLICE CRIMINAL COMPLAINT

Docket Number: CR-20-0020	Date Filed: 9/24/20	OTN/LiveScan Number: U915496-4	Complaint/Incident Number: OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA

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.)

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	TITLE 18	1	F2
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense 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: The Defendant did, take or exercise unlawful control over movable property of another, with the intent to deprive him thereof. The Defendant also committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life.							

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____			
<input type="checkbox"/>	2	3921	a	of the	TITLE 18	1	F2
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense 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 CONSPIRACY							
Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Unlawful Taking or Disposition, Title 18, Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.							

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 3	of the	TITLE 18	1	F3
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense 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: The defendant did intentionally obtains or withhold property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship.							



POLICE CRIMINAL COMPLAINT

Docket Number: CR251-28	Date Filed: 9/21/20	OTN/LiveScan Number U913494-4	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	3922	a 3	of the	TITLE 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 CONSPIRACY**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Deception, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crimes of theft by deception in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	3925	a	of the	TITLE 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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The Defendant did, intentionally receive, retain or dispose of movable property of another knowing that it had been stolen or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>				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: <u>CL 251-20</u>	Date Filed: <u>9/21/20</u>	QTN/LiveScan Number: <u>U 9159964</u>	Complaint/Incident Number: OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA

- 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 19
- 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.)

SEPTEMBER 22

2020

(Date)

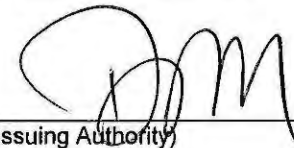
(Year)


 (Signature of Affiant)

AND NOW, on this date 9/21/20 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.

12304
 (Magisterial District Court Number)


 (Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number: <i>CR25120</i>	Date Filed: <i>9/12/20</i>	OTN/LiveScan Number <i>U9159964</i>	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA

AFFIDAVIT of PROBABLE CAUSE

The Pennsylvania Department of Labor and Industry reported that Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all applied for PUA in March of 2020 and all except Neff Zonge received PUA benefit payments. Based upon their dates of incarceration none of the inmates would have been eligible for PUA benefit payments.

Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig are all currently inmates at the State Correctional Institution Benner located in Benner Township in Centre County, PA. Department of Corrections information indicated that Todd A. Butler has been incarcerated from 2000 to present, Jacob P. Snook has been incarcerated from 2016 to present, James E. Sullivan has been incarcerated from 2016 to present, Derek L. Young has been incarcerated from 2019 to present, Ronald E. Baker has been incarcerated since 2013 to present, James G. Neff Zonge has been incarcerated since 2019 to present, Michael C. Lyter has been incarcerated since 2009 to present, James M. Leidig has been incarcerated since 2017 to present, and Joseph E. Klecha has been incarcerated since 2012 to present.

Pennsylvania Department of Labor and Industry records showed that all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig had their applications filed from the same IP address address 71.207.11.46. Your Affiant conducted a search and determined that IP address 71.207.11.46 is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Jacob P. Snook's claim. Pennsylvania Department of Labor and Industry records show that Snook's application for PUA was submitted on June 12, 2020. On the application it was reported that Snook's last day of employment was 3/13/2020. Your Affiant notes that Snook was



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA

incarcerated on the date his application was submitted. Additionally, records show that Snook's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Snook. Records show that Snook received payments on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$10,125.00. The payments were from the last day of work listed on Snook's application to present. These payments directly coincide with the time that Snook was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 6072. This card was sent to 1731 Blue Course Drive, PA. Phone number 814-826-8555 was used on the application as Snook's phone number. As a part of this investigation, your Affiant conducted a property records search and determined that Donald Moore and Adele Moore live at this address. Snook is from Centre County and his girlfriend is Adele Moore.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James E. Sullivan's claim. Pennsylvania Department of Labor and Industry records show that Sullivan's application for PUA was submitted on June 16, 2020. On the application it was reported that Sullivan's last day of employment was 3/18/2020. Your Affiant notes that Sullivan was incarcerated on the date his application was submitted. Additionally, records show that Sullivan's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Sullivan. Records show that Sullivan received payments on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Sullivan's application to present. These payments directly coincide with the time that Sullivan was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 6664. This card was sent to

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138 High Blue Ave, Hawley, PA in Wayne County. As a part of this investigation, your Affiant conducted a property records search and determined that Julia Sullivan lives at this address. Records check indicated that Young is from the Wayne County area and that his mother is Julia Sullivan.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Todd A. Butler's claim. Pennsylvania Department of Labor and Industry records show that Butler's application for PUA was submitted on June 17, 2020. On the application it was reported that Butler's last day of employment was 3/18/2020. Your Affiant notes that Butler was incarcerated on the date his application was submitted. Additionally, records show that Butler's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Butler. Records show that Butler received payments on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Butler's application to present. These payments directly coincide with the time that Butler was incarcerated at SCI Benner. The PUA payments were made by check and using a US Bank pre-paid debit card with the last four numbers 7797. This card was sent to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. As a part of this investigation, your Affiant conducted a property records search and determined that James Zonge lives at this address and the property was recently listed for sale. Todd Butler has never lived in Centre County and prior to his incarceration he resided in the Ohio and Pittsburgh areas. James Zonge is the father of James Neff Zonge who is currently incarcerated at SCI Benner.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Derek L. Young's claim. Pennsylvania Department of

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Labor and Industry records show that Young's application for PUA was submitted on June 12, 2020. On the application it was reported that Young's last day of employment was 3/18/2020. Your Affiant notes that Young was incarcerated on the date his application was submitted. Additionally, records show that Young's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Young. Records show that Young received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Young's application to present. These payments directly coincide with the time that Young was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 0093. This card was sent to 574 Lehman Drive, Watsonstown, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Larry and Stephanie Young live at this address. Young is from the Watsonstown, PA area and his mother is Stephanie Young.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Ronald E. Baker's claim. Pennsylvania Department of Labor and Industry records show that Baker's application for PUA was submitted on June 30, 2020. On the application it was reported that Baker's last day of employment was 3/18/2020. Your Affiant notes that Baker was incarcerated on the date his application was submitted. Additionally, records show that Baker's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Baker. Records show that Baker received payments on 7/1/20, 7/9/20, 7/15/20, and 7/21/20. The total for all the

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payments was \$13,110.00. The payments were from the last day of work listed on Baker's application to present. These payments directly coincide with the time that Baker was incarcerated at SCI Benner. The PUA payments were made by checks sent to 44 Glen Ave, Glenrock, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Rose M. Yetter resides at this address. Records search shows that Baker is from Glenrock, PA and his mother is Rose M. Yetter.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Michael C. Lyter's claim. Pennsylvania Department of Labor and Industry records show that Lyter's application for PUA was submitted on June 25, 2020. On the application it was reported that Lyter's last day of employment was 3/18/2020. Your Affiant notes that Lyter was incarcerated on the date his application was submitted. Additionally, records show that Lyter's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Lyter. Records show that Lyter received payments on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Lyter's application to present. These payments directly coincide with the time that Lyter was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 0490. This card was sent to 96 Peach Road, Liverpool, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Savannah Lyter lives at this address. Savannah Lyter is the wife of Michael C. Lyter.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Joseph E. Klecha's claim. Pennsylvania Department of Labor and Industry records show that Klecha's application for PUA was submitted on June 27, 2020. On the

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application it was reported that Klecha's last day of employment was 3/18/2020. Your Affiant notes that Klecha was incarcerated on the date his application was submitted. Additionally, records show that Klecha's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Klecha. Records show that Klecha received payments on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Klecha's application to present. These payments directly coincide with the time that Klecha was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 2915. This card was sent to 322 Charles Rd, Montrose, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Joanne (Klecha) Hogan lives at this address. Joanne (Klecha) Hogan is the mother of Joseph E. Klecha.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James M Leidig's claim. Pennsylvania Department of Labor and Industry records show that Leidig's application for PUA was submitted on June 22, 2020. On the application it was reported that Leidig's last day of employment was 3/18/2020. Your Affiant notes that Leidig was incarcerated on the date his application was submitted. Additionally, records show that Leidig's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Leidig. Records show that Leidig received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$22,245.00. The payments were from the last day of work listed on Leidig's application to present. These payments directly coincide with the time that Leidig was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 4556. This card was sent to 6659 Nunnery

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Rd, Waynesboro, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Serena Snyder lives at this address. Serena Snyder is the girlfriend of James M. Leidig.

All SCI Benner inmates Snook, Sullivan, Butler, Young, Baker, Neff Zonge, Lyter, Klecha, and Leidig had their applications submitted by IP address 71.207.11.46 which is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054 in the same week in June of 2020. All inmates were incarcerated for the entire 2020 year but all listed on their applications their last day of work as March of 2020.

Your Affiant was able to identify the phone number 814-826-8555 that was used to submit the first application for inmate Jacob Snook. Checks online and with the State College Police Department determined that the phone number belonged to an Adele B. Moore who resides at 1731 Blue Course Drive, State College, PA. Adele Moore's address was also the address used on Jacob Snook's application and where the US Bank Debit card was mailed. State College Police also reported that based upon prior incidents they believed that Snook and Moore were boyfriend and girlfriend.

On 8/13/20 your Affiant went to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. Your Affiant interviewed the home owner James Zonge. Zonge stated that he had received a letter from the unemployment office for a Todd Butler. Zonge stated his son James Neff-Zonge is in SCI Benner and had asked him to allow a friend Todd Butler to use his address. Zonge stated that his son told him that his friend had just gotten out of jail and needed help getting back on his feet. Zonge reported that when the letter came his son Neff-Zonge advised him to call a female friend and she would come pick the letter up. Zonge stated that the girl was a friend of his sons and provided the name Adele Moore and gave her phone number as 814-826-8555. Zonge stated that he had made arrangements for Adele Moore to pick up the letter for Todd Butler though his sister due to him being out of town. Zonge stated that to his knowledge Adele Moore received the letter from his sister.

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On 8/14/20 your Affiant located and interviewed Adele B. Moore at the State College Police Department. Moore was advised of the investigation and the information that had been obtained from all the involved agencies. Adele Moore who was visibly upset admitted that she is inmate Jacob Snook's girlfriend and admitted that she had submitted the PUA Applications for the inmates involved. Moore stated that she first got the idea from Jacob Snook when he was in SCI Huntingdon. Moore stated that Snook told her to file the application and then he got transferred to SCI Benner. Moore stated that on 6/12/20 she submitted the PUA application online for Jacob Snook. Moore stated that she is also friends with and talks with SCI Benner inmate James Neff Zonge whom she knew from them both living in Centre County, PA. Moore reported that during conversations with Neff Zonge she told him what she did for Snook regarding the unemployment application and Neff Zonge asked her to fill out an application for him. Moore stated that she tried to fill out the PUA application for Neff Zonge but could not complete the application with Neff Zonge's social security number. Moore stated that she then told Neff Zonge that his application did not work and he then gave her name and information on other inmates to submit applications. Moore stated that she then submitted applications for SCI Benner inmates James Sullivan, Todd Butler, Derek Davis, Ronald Baker, and other inmates. Moore indicated that not all applications she submitted worked. Moore stated that she submitted all the applications from her residence. Moore stated that the residence belongs to her father Donald Moore and that the internet provider that her father uses is Comcast Cable. Moore stated that she received or obtained the debit cards for Jacob Snook and Todd Butler. Moore stated that inmate Butler is not from Pennsylvania and did not have anyone to help him on the outside or a PA address. Moore stated that they used James Neff-Zonge's father and his father's address for Todd Butler's application. Moore stated that the other debit cards were sent to the inmate's families or friends and then the family member or friend activated and used the debit cards. Moore stated that the arrangement was that Moore would receive \$500 from the inmate's family member or friend for her filling out the applications. Moore used the debit cards in Jacob Snook and Todd Butler to put money in Snook, Butler, and Neff Zonge's JPay

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accounts using her name and a fake name of Christina Fisher. Moore stated that she also withdrew money on a daily basis and spent some of it on miscellaneous items for herself. Moore was asked where the remaining approximately \$7000.00 was spent and she stated that she paid her bills, paid her probation fines and costs, gave James Neff-Zonge's mother Linda Neff cash, and a large portion of the money was used by her at a medical marijuana dispensary in State College. Moore was asked where the debit cards for Snook and Butler were currently located and she pulled the debit cards for Snook and Butler out of her wallet. Moore turned the cards over to your Affiant. Moore stated that she was unsure if the cards had any remaining balances on them. Moore stated that she did receive \$500 from a family member of inmate Derek Young through a mobile app called "Cash App". Moore stated that she receive \$500 from a family member of inmate James Sullivan through the mobile app "Cash App". Moore stated that she also received \$500 from a family member of inmate Ronald Baker through a check in the mail because the person reportedly Baker's elderly mother did not have access to the mobile app. Moore stated that she knew that the filing for the PUA money was illegal and expressed concern over going to jail and others being arrested.

Affiant reviewed prison phone calls from June, July, august between Adele Moore and inmate James Neff Zonge and inmate Jacob Snook. Moore talks extensively about filing for the PUA money and discussing how to avoid being caught and concern over being charged criminally if caught. Moore made and received multiple calls and messages from inmates to assist in the filing of the applications and the distributions of the funds to herself and involved inmates. On July 16, 2020 Adele Moore had a conversation by phone with Jacob Snook. During the phone call Moore tells Snook that James Neff Zonge provides her with the inmate name and she then fills out the application. Moore states that she sends the money to the inmates "people" and when they receive the money the send \$2000.00 by Cash App to Neff Zonge's mother. Moore states that Neff Zonge's mother then gives her \$1000.00.

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Affiant also reviewed Department of Labor and Industry records and determined that Adele Moore had filed for numerous inmates and had filed PUA applications for more inmates that she had admitted to during her interview on 8/14/20.

On 8/20/20 Affiant spoke with Linda Neff the mother of inmate James Neff Zonge. Linda Neff who lives at 1850 North Oak Lane, State College, PA 16803 stated that she did receive money from Adele Moore and place the money on her sons prison account. Linda Neff stated that she believed that the money was from friend and did not know it was illegally obtained money from unemployment.

The Pennsylvania Department of Labor and Industry also provided information that James Neff Zonge was issued a US Bank pre-paid debit card with the last four digits 1282 and that the card was sent to Neff Zonge's mother's address at 1850 North Oak Lane, State College, PA 16803. Neff Zonge was issued a US Bank debit cards but no funds were deposited in the account.

On 8/21/20 Affiant spoke with Stephanie Young the mother of inmate Derek Young. Stephanie Young was in possession of the US Bank debit card and turned over the card you your Affiant. Stephanie Young was also in possession of \$2000.00 cash that she had withdrawn and placed in a safe in her home. Young stated that her son had instructed her what to do with the debit card from prison and told her that it was old unemployment related to a settlement which was owed to him. Young stated that she withdrew money from the card and placed money on her sons prison account. Young stated that she was suspicious because she was also instructed to send money to Adele Moore and Linda Neff for them filling out the paperwork for the money. Young provided screenshots of Cash App transaction from her phone from July 1, 2020 and July 2, 2020 where she sent Linda Neff a total of \$2000.00 (two \$1000.00 payments). Young also provided a screenshot of a Cash App transaction from July 27, 2020 where she sent Adele Moore \$500.00. Young stated that she was instructed by her son Derek Young to pay Linda Neff and Adele Moore for their help with obtaining the money.

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Your Affiant obtained the SCI Benner inmate money account information "JPay" for all the inmates involved. All the inmates involved Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all had payments placed on their JPay accounts on or around the time of each of the PUA payments that were deposited on the US Bank pre-paid debit card for the inmates.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Jacob P. Snook debit card on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Snook received money on his account from Adele Moore on 6/25/20, 6/29/20, 7/2/20, 7/5/20, 7/9/20, 7/12/20, 7/13/20, 7/17/20, 7/23/20, and 7/27/20. The total amount deposited on Jacob Snook's JPay account by Adele Moore was \$3150.00.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Todd A. Butler's debit card on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Butler received money on his account from Christina Fisher an alias used by Adele Moore on 6/28/20, 7/1/20, 7/5/20, 7/9/20, 7/13/20, 7/17/20, 7/25/20, 7/29/20, and 8/10/20. The total amount deposited on Todd Butler's JPay account by Adele Moore was \$2000.00.

The SCI Benner inmate money account JPay showed that James Neff Zonge received money on his account from Linda Neff on 6/22/20, 6/26/20, 6/30/20, 7/4/20, 7/8/20, 7/9/20, 7/12/20, 7/15/20, 7/19/20, 7/23/20, 7/27/20, 7/29/20, and 7/30/20. The total amount deposited on Neff Zonge's JPay account by Linda Neff was \$3150.00. Linda Neff is the mother of inmate James Neff Zonge and her address is 1850 N. Oak Lane, State College, PA.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Derek L. Young's debit card on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed

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that Young received money on his account from Stephanie L. Young on 6/23/20, 6/26/20, 7/4/20, 7/11/20, 7/18/20, 7/25/20, 7/28/20, 8/1/20, 8/7/20, and 8/9/20. The total amount deposited on Derek Young's JPay account by Stephanie L. Young was \$970.00. Records check indicated that Stephanie L. Young is the name of inmate Derek Young's mother and her address is 574 Lehman Drive, Watontown, PA. This is the same address used on Young's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James E. Sullivan's debit card on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Sullivan received money on his account from Julia Sullivan on 6/17/20, 7/7/20, 7/10/20, 7/26/20, and 8/7/20. The total amount deposited on James Sullivan's JPay account by Julia Sullivan was \$700.00. Records check indicated that Julia Sullivan is the name of inmate James Sullivan's mother and her address is 138 High Blue Ave, Hawley, PA. This is the same address used on Sullivan's PUA application and where his US Bank debit card was mailed. Contacted was made with Julia Sullivan and she was in possession of the US Bank Debit card in James Sullivan's name and was also in possession of \$9000 that she had withdrawn at her son's request using the debit card.

The Pennsylvania Department of Labor and Industry records show that PUA payment checks were sent to Ronald E. Baker on 7/1/20, 7/9/20, 7/15/20 and 7/21/20. The SCI Benner inmate money account JPay showed that Baker received money on his account from Rose M. Yetter on 7/17/20, 7/25/20, 7/31/20, and 8/10/20. The total amount deposited on Ronald Baker's JPay account by Rose M. Yetter was \$1000.00. Records check indicated that Rose M. Yetter is the name of inmate Ronald Baker's mother and her address is 44 Glen Ave, Glenrock, PA. This is the same address used on Baker's PUA application and where his checks were mailed.

On 8/20/20 Affiant spoke with Rose M. Yetter. Rose Yetter is the elderly mother of inmate Ronald Baker and owns the house at 44 Glen Ave, Glenrock, PA. Yetter stated that her son had lived at the address and she owns the property.

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Yetter was asked if she had been receiving unemployment money for her son Ronald. Yetter stated that her son Ronald called her from prison and told her that he would be getting unemployment and when she received money she was to put money on his account and use some of the money to help pay her bills. Yetter reported that she gets checks sent to her and she then puts money on her sons account. Yetter stated that she does not know who sends her the money. Yetter stated that she had also sent a personal check to a girl for helping her son get his unemployment but she could not recall the girl's name.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Michael C. Lyter's debit card on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter 8/2/20 and 8/16/20. The total amount deposited on Derek Young's JPay account by Savanna Lyter was \$3000.00. Records check indicated that Savanna Lyter is the name of inmate Michael Lyter's wife and her address is 96 Peach Rd, Liverpool, PA. This is the same address used on Lyter's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Joseph E. Klecha's debit card on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Klecha received money on his account from Joanne Klecha 7/7/20, 7/18/20, 8/9/20, 8/15/20, 8/24/20 and 8/26/20. The total amount deposited on Joseph Klecha's JPay account by Joanne Klecha was \$370.00. Records check indicated that Joanne Lyter is the name of inmate Joseph Klecha's mother and her address is 322 Charles Rd, Montrose, PA. This is the same address used on Klecha's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James M. Leidig's debit card on 6/23/20, 7/3/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter (Michael Lyter's wife) on 7/7/20, Christina B. Fisher (Adele

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Moore) on 7/17/20, and from Stephanie Young (Derek Young's mother) on 7/4/20, 7/25/20, 8/1/20, 8/9/20, 8/16/20, 8/23/20, 8/30/20. The total amount deposited on James Leidig's JPay account was \$465.00.

On 9/2/20 your Affiant interviewed all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig at SCI Benner.

Jacob P. Snook, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig admitted to their involvement in receiving the unemployment money. Inmate Todd Butler made no statements. James Neff Zonge stated that Adele Moore asked him if he wanted to apply for the unemployment and he agreed and then provided her with other inmate's names for her to fill out applications.

Affiant reviewed prison phone calls and messages between Adele Moore and Jacob Snook and Adele Moore and James Neff Zonge. Affiant confirmed through the messages that Adele Moore first applied for PUA for herself and Snook then spoke with Neff Zonge and he provided her with his information the additional inmate names and information. Neff Zonge provided the inmate information and discussed filing the application and how the money would be shared and dispersed over the phone with Adele Moore.

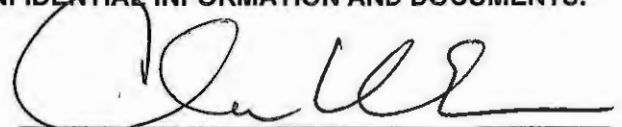


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Docket Number: <u>CL251-80</u>	Date Filed: <u>9/21/20</u>	OTN/LiveScan Number <u>U915996-4</u>	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA

I, SPECIAL AGENT CHRISTOPHER WEAVER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

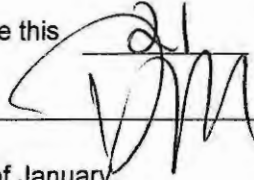
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



(Signature of Affiant)

Sworn to me and subscribed before me this 21 day of September 2020

9/21/20 Date



Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic A. Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

MICHAEL

First Name

(NAME and ADDRESS):

C

Middle Name

LYTER

Last Name

SCI Benner Township, 301 Institution Drive,
Bellefonte, PA 16823

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-250-20</u>		Date Filed <u>9/21/20</u>		OTN/LiveScan Number <u>U915988-3</u>		Complaint/Incident Number <u>OCC-20-0020</u>		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 09/19/1980		POB Nc		Add'l DOB / /		Co-Defendant(s) <input checked="" 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 checked="" 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 type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input checked="" 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 checked="" type="checkbox"/> BLU (Blue) <input 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 checked="" type="checkbox"/> NO	
FBI Number		MNU Number		WEIGHT (lbs.) 235		Ft. HEIGHT In. 6		1	
Defendant Fingerprinted		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		Fingerprint Classification:					

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

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

HEATHER A. CASTELLINO, SDAG

(Name of the attorney for the Commonwealth)

Admitted via PA0000
(Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, SPECIAL AGENT CHRISTOPHER WEAVER

BADGE #603

(PSP/MP0ETC -Assigned Affiant ID Number & Badge #

of Pennsylvania Office of Attorney General

PA0222400

(Police Agency ORI Number)

(Identify Department or Agency Represented and Political Subdivision)

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] PA Dept Of Labor And Industry,
651 Boas St, Harrisburg, Pa (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MARCH 12, 2020 TO AUGUST 31, 2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

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.)

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	TITLE 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	
Statute Description (include the name of statute or ordinance): THEFT BY UNLAWFUL TAKING OR DISPOSITION									
Acts of the accused associated with this Offense: The Defendant did, take or exercise unlawful control over movable property of another, with the intent to deprive him thereof. The Defendant also committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	2	3921	a	of the	TITLE 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	
Statute Description (include the name of statute or ordinance): CRIMINAL CONSPIRACY									
Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Unlawful Taking or Disposition, Title 18, Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.									

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 3	of the	TITLE 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): THEFT BY DECEPTION									
Acts of the accused associated with this Offense: The defendant did intentionally obtains or withhold property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship.									



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Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 4	3922	a 3	of the	TITLE 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 CONSPIRACY								

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Deception, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crimes of theft by deception in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 5	3925	a	of the	TITLE 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): RECEIVING STOLEN PROPERTY								

Acts of the accused associated with this Offense: The Defendant did, intentionally receive, retain or dispose of movable property of another knowing that it had been stolen or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner.

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

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Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

AFFIDAVIT of PROBABLE CAUSE

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords. Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

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The Pennsylvania Department of Labor and Industry reported that Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all applied for PUA in March of 2020 and all except Neff Zonge received PUA benefit payments. Based upon their dates of incarceration none of the inmates would have been eligible for PUA benefit payments.

Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig are all currently inmates at the State Correctional Institution Benner located in Benner Township in Centre County, PA. Department of Corrections information indicated that Todd A. Butler has been incarcerated from 2000 to present, Jacob P. Snook has been incarcerated from 2016 to present, James E. Sullivan has been incarcerated from 2016 to present, Derek L. Young has been incarcerated from 2019 to present, Ronald E. Baker has been incarcerated since 2013 to present, James G. Neff Zonge has been incarcerated since 2019 to present, Michael C. Lyter has been incarcerated since 2009 to present, James M. Leidig has been incarcerated since 2017 to present, and Joseph E. Klecha has been incarcerated since 2012 to present.

Pennsylvania Department of Labor and Industry records showed that all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig had their applications filed from the same IP address 71.207.11.46. Your Affiant conducted a search and determined that IP address 71.207.11.46 is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Jacob P. Snook's claim. Pennsylvania Department of Labor and Industry records show that Snook's application for PUA was submitted on June 12, 2020. On the

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application it was reported that Snook's last day of employment was 3/13/2020. Your Affiant notes that Snook was incarcerated on the date his application was submitted. Additionally, records show that Snook's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Snook. Records show that Snook received payments on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$10,125.00. The payments were from the last day of work listed on Snook's application to present. These payments directly coincide with the time that Snook was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 6072. This card was sent to 1731 Blue Course Drive, PA. Phone number 814-826-8555 was used on the application as Snook's phone number. As a part of this investigation, your Affiant conducted a property records search and determined that Donald Moore and Adele Moore live at this address. Snook is from Centre County and his girlfriend is Adele Moore.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James E. Sullivan's claim. Pennsylvania Department of Labor and Industry records show that Sullivan's application for PUA was submitted on June 16, 2020. On the application it was reported that Sullivan's last day of employment was 3/18/2020. Your Affiant notes that Sullivan was incarcerated on the date his application was submitted. Additionally, records show that Sullivan's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Sullivan. Records show that Sullivan received payments on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Sullivan's application to present. These payments directly coincide with the time that Sullivan was incarcerated at SCI Benner. The PUA

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payments were made using a US Bank pre-paid debit card with the last four numbers 6664. This card was sent to 138 High Blue Ave, Hawley, PA in Wayne County. As a part of this investigation, your Affiant conducted a property records search and determined that Julia Sullivan lives at this address. Records check indicated that Young is from the Wayne County area and that his mother is Julia Sullivan.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Todd A. Butler's claim. Pennsylvania Department of Labor and Industry records show that Butler's application for PUA was submitted on June 17, 2020. On the application it was reported that Butler's last day of employment was 3/18/2020. Your Affiant notes that Butler was incarcerated on the date his application was submitted. Additionally, records show that Butler's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Butler. Records show that Butler received payments on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Butler's application to present. These payments directly coincide with the time that Butler was incarcerated at SCI Benner. The PUA payments were made by check and using a US Bank pre-paid debit card with the last four numbers 7797. This card was sent to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. As a part of this investigation, your Affiant conducted a property records search and determined that James Zonge lives at this address and the property was recently listed for sale. Todd Butler has never lived in Centre County and prior to his incarceration he resided in the Ohio and Pittsburgh areas. James Zonge is the father of James Neff Zonge who is currently incarcerated at SCI Benner.

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The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Derek L. Young's claim. Pennsylvania Department of Labor and Industry records show that Young's application for PUA was submitted on June 12, 2020. On the application it was reported that Young's last day of employment was 3/18/2020. Your Affiant notes that Young was incarcerated on the date his application was submitted. Additionally, records show that Young's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Young. Records show that Young received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Young's application to present. These payments directly coincide with the time that Young was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 0093. This card was sent to 574 Lehman Drive, Watson town, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Larry and Stephanie Young live at this address. Young is from the Watson town, PA area and his mother is Stephanie Young.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Ronald E. Baker's claim. Pennsylvania Department of Labor and Industry records show that Baker's application for PUA was submitted on June 30, 2020. On the application it was reported that Baker's last day of employment was 3/18/2020. Your Affiant notes that Baker was incarcerated on the date his application was submitted. Additionally, records show that Baker's application was submitted by an individual using IP Address IP address 71.207.11.46.



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The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Baker. Records show that Baker received payments on 7/1/20, 7/9/20, 7/15/20, and 7/21/20. The total for all the payments was \$13,110.00. The payments were from the last day of work listed on Baker's application to present. These payments directly coincide with the time that Baker was incarcerated at SCI Benner. The PUA payments were made by checks sent to 44 Glen Ave, Glenrock, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Rose M. Yetter resides at this address. Records search shows that Baker is from Glenrock, PA and his mother is Rose M. Yetter.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Michael C. Lyter's claim. Pennsylvania Department of Labor and Industry records show that Lyter's application for PUA was submitted on June 25, 2020. On the application it was reported that Lyter's last day of employment was 3/18/2020. Your Affiant notes that Lyter was incarcerated on the date his application was submitted. Additionally, records show that Lyter's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Lyter. Records show that Lyter received payments on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Lyter's application to present. These payments directly coincide with the time that Lyter was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 0490. This card was sent to 96 Peach Road, Liverpool, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Savannah Lyter lives at this address. Savannah Lyter is the wife of Michael C. Lyter.

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The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Joseph E. Klecha's claim. Pennsylvania Department of Labor and Industry records show that Klecha's application for PUA was submitted on June 27, 2020. On the application it was reported that Klecha's last day of employment was 3/18/2020. Your Affiant notes that Klecha was incarcerated on the date his application was submitted. Additionally, records show that Klecha's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Klecha. Records show that Klecha received payments on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Klecha's application to present. These payments directly coincide with the time that Klecha was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 2915. This card was sent to 322 Charles Rd, Montrose, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Joanne (Klecha) Hogan lives at this address. Joanne (Klecha) Hogan is the mother of Joseph E. Klecha.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James M Leidig's claim. Pennsylvania Department of Labor and Industry records show that Leidig's application for PUA was submitted on June 22, 2020. On the application it was reported that Leidig's last day of employment was 3/18/2020. Your Affiant notes that Leidig was incarcerated on the date his application was submitted. Additionally, records show that Leidig's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Leidig. Records show that Leidig received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the

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payments was \$22,245.00. The payments were from the last day of work listed on Leidig's application to present. These payments directly coincide with the time that Leidig was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 4556. This card was sent to 6659 Nunnery Rd, Waynesboro, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Serena Snyder lives at this address. Serena Snyder is the girlfriend of James M. Leidig.

All SCI Benner inmates Snook, Sullivan, Butler, Young, Baker, Neff Zonge, Lyter, Klecha, and Leidig had their applications submitted by IP address 71.207.11.46 which is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054 in the same week in June of 2020. All inmates were incarcerated for the entire 2020 year but all listed on their applications their last day of work as March of 2020.

Your Affiant was able to identify the phone number 814-826-8555 that was used to submit the first application for inmate Jacob Snook. Checks online and with the State College Police Department determined that the phone number belonged to an Adele B. Moore who resides at 1731 Blue Course Drive, State College, PA. Adele Moore's address was also the address used on Jacob Snook's application and where the US Bank Debit card was mailed. State College Police also reported that based upon prior incidents they believed that Snook and Moore were boyfriend and girlfriend.

On 8/13/20 your Affiant went to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. Your Affiant interviewed the home owner James Zonge. Zonge stated that he had received a letter from the unemployment office for a Todd Butler. Zonge stated his son James Neff-Zonge is in SCI Benner and had asked him to allow a friend Todd Butler to use his address. Zonge stated that his son told him that his friend had just gotten out of jail and needed help getting back on his feet. Zonge reported that when the letter came his son Neff-Zonge advised him to call a female friend and she would come pick the letter up. Zonge stated that the girl was a friend of his sons and provided the name Adele Moore and gave her phone number as 814-826-8555. Zonge stated that he had made arrangements

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for Adele Moore to pick up the letter for Todd Butler though his sister due to him being out of town. Zonge stated that to his knowledge Adele Moore received the letter from his sister.

On 8/14/20 your Affiant located and interviewed Adele B. Moore at the State College Police Department. Moore was advised of the investigation and the information that had been obtained from all the involved agencies. Adele Moore who was visibly upset admitted that she is inmate Jacob Snook's girlfriend and admitted that she had submitted the PUA Applications for the inmates involved. Moore stated that she first got the idea from Jacob Snook when he was in SCI Huntingdon. Moore stated that Snook told her to file the application and then he got transferred to SCI Benner. Moore stated that on 6/12/20 she submitted the PUA application online for Jacob Snook. Moore stated that she is also friends with and talks with SCI Benner inmate James Neff Zonge whom she knew from them both living in Centre County, PA. Moore reported that during conversations with Neff Zonge she told him what she did for Snook regarding the unemployment application and Neff Zonge asked her to fill out an application for him. Moore stated that she tried to fill out the PUA application for Neff Zonge but could not complete the application with Neff Zonge's social security number. Moore stated that she then told Neff Zonge that his application did not work and he then gave her name and information on other inmates to submit applications. Moore stated that she then submitted applications for SCI Benner inmates James Sullivan, Todd Butler, Derek Davis, Ronald Baker, and other inmates. Moore indicated that not all applications she submitted worked. Moore stated that she submitted all the applications from her residence. Moore stated that the residence belongs to her father Donald Moore and that the internet provider that her father uses is Comcast Cable. Moore stated that she received or obtained the debit cards for Jacob Snook and Todd Butler. Moore stated that inmate Butler is not from Pennsylvania and did not have anyone to help him on the outside or a PA address. Moore stated that they used James Neff-Zonge's father and his father's address for Todd Butler's application. Moore stated that the other debit cards were sent to the inmate's families or friends and then the family member or friend activated and used the debit cards. Moore stated that the arrangement

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Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

was that Moore would receive \$500 from the inmate's family member or friend for her filling out the applications. Moore used the debit cards in Jacob Snook and Todd Butler to put money in Snook, Butler, and Neff Zonge's JPay accounts using her name and a fake name of Christina Fisher. Moore stated that she also withdrew money on a daily basis and spent some of it on miscellaneous items for herself. Moore was asked where the remaining approximately \$7000.00 was spent and she stated that she paid her bills, paid her probation fines and costs, gave James Neff-Zonge's mother Linda Neff cash, and a large portion of the money was used by her at a medical marijuana dispensary in State College. Moore was asked where the debit cards for Snook and Butler were currently located and she pulled the debit cards for Snook and Butler out of her wallet. Moore turned the cards over to your Affiant. Moore stated that she was unsure if the cards had any remaining balances on them. Moore stated that she did receive \$500 from a family member of inmate Derek Young through a mobile app called "Cash App". Moore stated that she receive \$500 from a family member of inmate James Sullivan through the mobile app "Cash App". Moore stated that she also received \$500 from a family member of inmate Ronald Baker through a check in the mail because the person reportedly Baker's elderly mother did not have access to the mobile app. Moore stated that she knew that the filing for the PUA money was illegal and expressed concern over going to jail and others being arrested.

Affiant reviewed prison phone calls from June, July, august between Adele Moore and inmate James Neff Zonge and inmate Jacob Snook. Moore talks extensively about filing for the PUA money and discussing how to avoid being caught and concern over being charged criminally if caught. Moore made and received multiple calls and messages from inmates to assist in the filing of the applications and the distributions of the funds to herself and involved inmates. On July 16, 2020 Adele Moore had a conversation by phone with Jacob Snook. During the phone call Moore tells Snook that James Neff Zonge provides her with the inmate name and she then fills out the application. Moore states that she sends the money to the inmates "people" and when they receive the money the send \$2000.00 by Cash App to Neff Zonge's mother. Moore states that Neff Zonge's mother then gives her \$1000.00.

**POLICE CRIMINAL COMPLAINT**

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Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

Affiant also reviewed Department of Labor and Industry records and determined that Adele Moore had filed for numerous inmates and had filed PUA applications for more inmates that she had admitted to during her interview on 8/14/20.

On 8/20/20 Affiant spoke with Linda Neff the mother of inmate James Neff Zonge. Linda Neff who lives at 1850 North Oak Lane, State College, PA 16803 stated that she did receive money from Adele Moore and place the money on her sons prison account. Linda Neff stated that she believed that the money was from friend and did not know it was illegally obtained money from unemployment.

The Pennsylvania Department of Labor and Industry also provided information that James Neff Zonge was issued a US Bank pre-paid debit card with the last four digits 1282 and that the card was sent to Neff Zonge's mother's address at 1850 North Oak Lane, State College, PA 16803. Neff Zonge was issued a US Bank debit cards but no funds were deposited in the account.

On 8/21/20 Affiant spoke with Stephanie Young the mother of inmate Derek Young. Stephanie Young was in possession of the US Bank debit card and turned over the card you your Affiant. Stephanie Young was also in possession of \$2000.00 cash that she had withdrawn and placed in a safe in her home. Young stated that her son had instructed her what to do with the debit card from prison and told her that it was old unemployment related to a settlement which was owed to him. Young stated that she withdrew money from the card and placed money on her sons prison account. Young stated that she was suspicious because she was also instructed to send money to Adele Moore and Linda Neff for them filling out the paperwork for the money. Young provided screenshots of Cash App transaction from her phone from July 1, 2020 and July 2, 2020 where she sent Linda Neff a total of \$2000.00 (two \$1000.00 payments). Young also provided a screenshot of a Cash App transaction from July 27, 2020 where she sent Adele Moore \$500.00. Young stated that she was instructed by her son Derek Young to pay Linda Neff and Adele Moore for their help with obtaining the money.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

Your Affiant obtained the SCI Benner inmate money account information "JPay" for all the inmates involved. All the inmates involved Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all had payments placed on their JPay accounts on or around the time of each of the PUA payments that were deposited on the US Bank pre-paid debit card for the inmates.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Jacob P. Snook debit card on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Snook received money on his account from Adele Moore on 6/25/20, 6/29/20, 7/2/20, 7/5/20, 7/9/20, 7/12/20, 7/13/20, 7/17/20, 7/23/20, and 7/27/20. The total amount deposited on Jacob Snook's JPay account by Adele Moore was \$3150.00.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Todd A. Butler's debit card on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Butler received money on his account from Christina Fisher an alias used by Adele Moore on 6/28/20, 7/1/20, 7/5/20, 7/9/20, 7/13/20, 7/17/20, 7/25/20, 7/29/20, and 8/10/20. The total amount deposited on Todd Butler's JPay account by Adele Moore was \$2000.00.

The SCI Benner inmate money account JPay showed that James Neff Zonge received money on his account from Linda Neff on 6/22/20, 6/26/20, 6/30/20, 7/4/20, 7/8/20, 7/9/20, 7/12/20, 7/15/20, 7/19/20, 7/23/20, 7/27/20, 7/29/20, and 7/30/20. The total amount deposited on Neff Zonge's JPay account by Linda Neff was \$3150.00. Linda Neff is the mother of inmate James Neff Zonge and her address is 1850 N. Oak Lane, State College, PA.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Derek L. Young's debit card on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

that Young received money on his account from Stephanie L. Young on 6/23/20, 6/26/20, 7/4/20, 7/11/20, 7/18/20, 7/25/20, 7/28/20, 8/1/20, 8/7/20, and 8/9/20. The total amount deposited on Derek Young's JPay account by Stephanie L. Young was \$970.00. Records check indicated that Stephanie L. Young is the name of inmate Derek Young' mother and her address is 574 Lehman Drive, Watsonstown, PA. This is the same address used on Young's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James E. Sullivan's debit card on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Sullivan received money on his account from Julia Sullivan on 6/17/20, 7/7/20, 7/10/20, 7/26/20, and 8/7/20. The total amount deposited on James Sullivan's JPay account by Julia Sullivan was \$700.00. Records check indicated that Julia Sullivan is the name of inmate James Sullivan's mother and her address is 138 High Blue Ave, Hawley, PA. This is the same address used on Sullivan's PUA application and where his US Bank debit card was mailed. Contacted was made with Julia Sullivan and she was in possession of the US Bank Debit card in James Sullivan's name and was also in possession of \$9000 that she had withdrawn at her son's request using the debit card.

The Pennsylvania Department of Labor and Industry records show that PUA payment checks were sent to Ronald E. Baker on 7/1/20, 7/9/20, 7/15/20 and 7/21/20. The SCI Benner inmate money account JPay showed that Baker received money on his account from Rose M. Yetter on 7/17/20, 7/25/20, 7/31/20, and 8/10/20. The total amount deposited on Ronald Baker's JPay account by Rose M. Yetter was \$1000.00. Records check indicated that Rose M. Yetter is the name of inmate Ronald Baker's mother and her address is 44 Glen Ave, Glenrock, PA. This is the same address used on Baker's PUA application and where his checks were mailed.

On 8/20/20 Affiant spoke with Rose M. Yetter. Rose Yetter is the elderly mother of inmate Ronald Baker and owns the house at 44 Glen Ave, Glenrock, PA. Yetter stated that her son had lived at the address and she owns the property.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

Yetter was asked if she had been receiving unemployment money for her son Ronald. Yetter stated that her son Ronald called her from prison and told her that he would be getting unemployment and when she received money she was to put money on his account and use some of the money to help pay her bills. Yetter reported that she gets checks sent to her and she then puts money on her sons account. Yetter stated that she does not know who sends her the money. Yetter stated that she had also sent a personal check to a girl for helping her son get his unemployment but she could not recall the girl's name.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Michael C. Lyter's debit card on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter 8/2/20 and 8/16/20. The total amount deposited on Derek Young's JPay account by Savanna Lyter was \$3000.00. Records check indicated that Savanna Lyter is the name of inmate Michael Lyter's wife and her address is 96 Peach Rd, Liverpool, PA. This is the same address used on Lyter's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Joseph E. Klecha's debit card on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Klecha received money on his account from Joanne Klecha 7/7/20, 7/18/20, 8/9/20, 8/15/20, 8/24/20 and 8/26/20. The total amount deposited on Joseph Klecha's JPay account by Joanne Klecha was \$370.00. Records check indicated that Joanne Lyter is the name of inmate Joseph Klecha's mother and her address is 322 Charles Rd, Montrose, PA. This is the same address used on Klecha's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James M. Leidig's debit card on 6/23/20, 7/3/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter (Michael Lyter's wife) on 7/7/20, Christina B. Fisher (Adele



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

Moore) on 7/17/20, and from Stephanie Young (Derek Young's mother) on 7/4/20, 7/25/20, 8/1/20, 8/9/20, 8/16/20, 8/23/20, 8/30/20. The total amount deposited on James Leidig's JPay account was \$465.00.

On 9/2/20 your Affiant interviewed all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig at SCI Benner.

Jacob P. Snook, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig admitted to their involvement in receiving the unemployment money. Inmate Todd Butler made no statements. James Neff Zonge stated that Adele Moore asked him if he wanted to apply for the unemployment and he agreed and then provided her with other inmate's names for her to fill out applications.

Affiant reviewed prison phone calls and messages between Adele Moore and Jacob Snook and Adele Moore and James Neff Zonge. Affiant confirmed through the messages that Adele Moore first applied for PUA for herself and Snook then spoke with Neff Zonge and he provided her with his information the additional inmate names and information. Neff Zonge provided the inmate information and discussed filing the application and how the money would be shared and dispersed over the phone with Adele Moore.



POLICE CRIMINAL COMPLAINT

Docket Number: 01-250-20	Date Filed: 9/21/20	OTN/LiveScan Number U9159188-3	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle: C	Last: LYTER

- 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 20
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently that non-confidential information and documents.

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

SEPTEMBER 22

2020

(Date)

(Year)


 (Signature of Affiant)

AND NOW, on this date

9/21/2020

I certify that the complaint has been properly completed and verified.

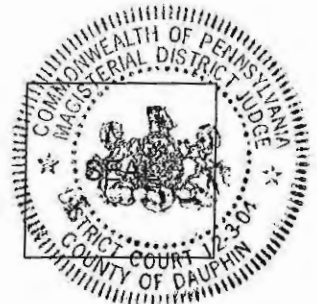
An affidavit of probable cause must be completed before a warrant can be issued.

12-3-04

(Magisterial District Court Number)



(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

MARKAL

T

MUNFORD

First Name

Middle Name

Last Name

Ge
n

SCI Mahanoy, 301 Morea Road
Frackville, PA 17932

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" 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 CK235-20	Date Filed 09/22/2020	OTN/LiveScan Number U 9158251	Complaint/Incident Number OCC-20-0023	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 12/30/1989	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name		Middle Name	Last Name	Gen.
AKA				

RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" 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 checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White)	<input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> XXX (Unknown)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
Eye Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)			

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
FBI Number	MNU Number	
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" 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. 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).

HEATHER CASTELLINO

(Name of the attorney for the Commonwealth)

Approved via Phone

(Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, KATHRYN GRADY

(Name of the Affiant)

590

(PSP/MPPOETC -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 [301] Harrisburg City
(Subdivision Code) (Place/Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020



POLICE CRIMINAL COMPLAINT

Docket Number: CR235-20	Date Filed: 9/11/2020	OTN/LiveScan Number U 915 825-1	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	911	B3	of the	18 PA C.S.A.	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: The Defendant did, being employed by or associated with an enterprise, did between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill and York, Pennsylvania and elsewhere, conduct or participate, directly or indirectly in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein. Defendant was associated with an enterprise constituting a group of individuals associated in fact, although not a legal entity, engaged in commerce and consisting of Wendy Danfora, Markal Munford, and others, and Defendant did conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 PA.C.S. §911(h) consisting of: [SEE ATTACHED OFFENSE CONTINUATION PAGE]

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	911	B4	of the	18 PA C.S.A.	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): **CORRUPT ORGANIZATIONS**

Acts of the accused associated with this Offense: In that the Defendant, did between May of 2020 and September of 2020, within the County of Schuylkill and Dauphin, York County, Pennsylvania and elsewhere, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. §911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with Markal Munford and other individuals, while employed or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as define in 18 PA.C.S.A. §911(h), in violation of Section 911(b)(4) of the Crimes Codes, 18 Pa.C.S.A. §911(b)(4).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	3921	A	of the	18 PA C.S.A.	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): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: To that the Defendant, a person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. To Wit: Wendy Danfora, Markal Munford, and others falsley filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and others, although they did not qualify for the benefits. Approximately \$153,470 in benefits were paid out as a result of fraudulent filings.

**POLICE CRIMINAL COMPLAINT**

Docket Number: CR 235-20	Date Filed: 9/12/2020	OTN/LiveScan Number U9158254	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 4	3921	A	of the	18 PA C.S.A.	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
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Statute Description (include the name of statute or ordinance): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill and York, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903. To Wit: Wendy Danfora, Markal Munford, and others falsely filed false applications for the Pandemic Unemployment Assistance benefit program.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 5	3922	A2	of the	18 PA C.S.A.	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
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford, and others falsely filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. On each application, the applicant must certify the information they provided are true and correct. The fraudulent filings totaled approximately \$153,470.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 6	3922	A2	of the	18 PA C.S.A.	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
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford and others falsely filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. The fraudulent filings totaled approximately \$153,470.



POLICE CRIMINAL COMPLAINT

Docket Number: CR235-20	Date Filed: 9/12/2024	OTN/LiveScan Number U9158251	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	3925	A	of the	18 PA C.S.A.	2	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant, Wendy Danfora, is guilty of theft if she intentionally receives, retains, or disposes of movable propert of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. To Wit: Wendy Danfora, Markal Munford, and others falsely filed for Pandemic Unemployment Assistance benefits program through the Pennsylvania Labor and Industry website for herself and multiple other individuals, although they did not qualify for the Pandemic Unemployment Assistance benefits. The fraudulent applications totaled approximately \$153,470.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	8	7512		of the	18 PA C.S.A.	2	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 COMMUNICATION FACILITY**

Acts of the accused associated with this Offense: To that the Defendant, uses a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime which constitutes a felony under this title or under the act of April 14, 1972 (P.L.233, No.64), known as the Controll Substance Drug, Device and Cosmetic Act. To Wit: Wendy Danfora and Markal Munford utilized electronic communications through the Department of Corrections SCI Mahanoy telephone communications and e-mail systems, and mailed letters which provided the personal identification information for Markal Munford and 6 other inmates. All applications filed for the Pandemic Unemployment Assistance were filed through the PA Department of Labor and Industry Website.

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

Docket Number: <i>CR 235-20</i>	Date Filed: 09/22/2020	OTN/LiveScan Number <i>U 9158251</i>	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

OFFENSE DESCRIPTION CONTINUATION

Offense # 1: CORRUPT ORGANIZATIONS:

- A. Multiple acts of Criminal Conspiracy to commit violations of the Chapter 39 of the Pennsylvania Crimes Code, 18 Pa.C.S.A. §903,
- B. Multiple acts of violation of the Chapter 49 of the Pennsylvania Crimes Code, including 18 Pa.C.S.A. §4911,
- C. Multiple acts of violation of Chapter 39 of the Pennsylvania Crimes Code, including 18 Pa.C.S.A §3921 and 18 Pa C.S.A. §3922;

in violation of Section 911(b)(3) of the Crimes Code, 18 PA.C.S.A. §911(b)(3).



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR235-20</u>	Date Filed: <u>9/21/2020</u>	OTN/LiveScan Number <u>U915825-1</u>	Complaint/Incident Number <u>OCC-20-0023</u>
Defendant Name:	First: <u>MARKAL</u>	Middle: <u>T</u>	Last: <u>MUNFORD</u>

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.

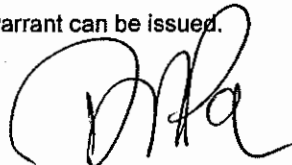
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

9/21/2020


(Signature of Affiant)

(Date) 9/21/20 (Year) I certify that the complaint has been properly completed and verified.

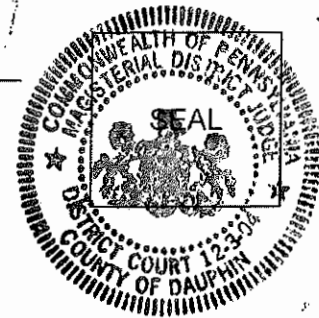
An affidavit of probable cause must be completed before a warrant can be issued.



(Issuing Authority)

12304

(Magisterial District Court Number)



**POLICE CRIMINAL COMPLAINT**

Docket Number: CR23520	Date Filed: 9/24/20	OTM/LiveScan Number U915 8251	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Kathryn Grady of the Pennsylvania Office of Attorney General (OAG),
being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Kathryn Grady, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation, and is empowered by law to conduct investigations and make arrests relating to white-collar crimes, theft, fraud, and other violations of Pennsylvania Law. Your Affiant currently holds the designation of "Certified Fraud Examiner" and has conducted numerous investigations involving financial crimes. Your Affiant has received training in electronic surveillance by the Pennsylvania State Police in accordance with the Pennsylvania Wiretapping and electronic Surveillance Control Act. This training resulted in the issuance of a class "A" certification, authorizing your Affiant to conduct criminal investigations using various wiretapping equipment, as authorized by Chapter 57 of the Pennsylvania Crimes Code. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5948. Your Affiant has been so employed since January 2018 and is currently assigned to the Financial Crime Section in Harrisburg, Pennsylvania. Prior to employment with the Pennsylvania Office of Attorney General, your Affiant was employed as a Security Investigator at First National Bank of Pennsylvania (formerly Metro Bank) and conducted fraud investigations with the Pennsylvania Office of Inspector General.

Based upon your Affiant's law enforcement experience and training, your Affiant is familiar with the manner in which various crimes are committed in the Commonwealth relating to public corruption, white collar crimes, theft and fraud. Based upon the foregoing training and experience, your Affiant has special expertise regarding the practices of, and techniques used by, these offenders.

II. BACKGROUND OF INVESTIGATION

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program

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called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry, located at 651 Boast Street, Harrisburg, PA 17121, administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: "Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.



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III. INVESTIGATION

Agent Grady received information from the Pennsylvania Department of Corrections (DOC), relating to an internal investigation they conducted where it was determined Markal Munford, an inmate at State Correctional Institute (SCI) Mahanoy, located at 301 Morea Rd, Frackville, PA 17932, was providing the names and personal identification of fellow inmates to Wendy Danfora. According to the information received from DOC, Munford instructed Danfora to use the information to file for PUA benefits on the behalf of himself and other inmates. DOC provided Agent Grady copies of the communications between Munford and Danfora.

Agent Grady reviewed these documents and learned between June and August 2020, Munford and Danfora communicated through letters, telephone calls, and electronic messages in reference to the filing of PUA benefits on behalf of inmates. In these communications Munford provided Danfora instructions on who to file applications for, how to file them, and how to move the money once she received the checks or debit cards in the mail. During many of the communications, there were issues between Munford and Danfora due to the slow pace in which Danfora filed these applications. Munford had concerns with how Danfora was handling the payout of the claims since it seemed she was slow to forward the money to the named applicant. Danfora indicated at times that she was struggling to cash checks and transfer money to other parties via Cash App. Danfora often stated she was having issues with the websites when trying to deposit the checks or move money. Danfora would tell Munford that she used Wal-Mart to send money as instructed. An outline of these communications has been provided below.

A. TELEPHONE COMMUNICATIONS

Agent Grady reviewed approximately 130 telephone conversations between Munford and Danfora that took place between May 16, 2020 and September 15, 2020. Below are details from some of their conversations



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relevant to this investigation. In three of these telephone calls, Munford provided Danfora the personal identifying information for inmates Keith Corprew, Frederick Owens, Naseer Moultrie, and Rahim Johnson. Munford told Danfora on several phone calls that he mailed her a letter with instructions on how to handle the information he has provided her. On several of the phone calls, Danfora told Munford that she has filed applications for his father, Mark Munford, her mother, Donna Essis, and her brother, Waide Danfora. Below are examples of these telephone conversations had between Munford and Danfora.

1. On June 23, 2020 at 7:33, Munford and Danfora spoke via telephone. Danfora stated one of the plastic was sent back due to an issue with the mailing address, but that she called and answered the security questions correctly so they will be sending her a new one. Danfora asked Munford for the identifying information for the other two that she did to set them up with an account. Munford asked whose information he needed to get for her. Danfora said for "F" and "N". Danfora wanted the information in case they received paper. Munford stated she needs to watch the mail for his letter and that he has more people for her to handle. Munford told Danfora once they see the paper; they are going to start flooding it.
2. On June 26, 2020 at 14:00, Munford and Danfora spoke via telephone. Danfora said she received his letter today. Munford asked if she was going to be able to handle what he sent her, to which Danfora said yes. Danfora confirmed she completed filings for "K", "N", and "F". Munford asked if she filed for "R". Danfora said she must have missed that one and to send her the information. Munford told her there should have been information for an "R" and a "J" before she filed his information. Danfora said she has only done three and his application. Munford told Danfora she has to be on it better because there are hipsters there and they are going through things quickly. Danfora explained how the weekly claim filings worked and told him that she has to do 11 of them every Sunday. Once she files, then the cards are normally funded by Thursday.



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3. On July 3, 2020 at 20:01, Munford and Danfora spoke via telephone. During this call, Munford said she needed to send money to Dee and to Keisha then send money to Keith or she needed to send money directly to Keith. Danfora said she set herself up with an online "john" at Wells. Munford said she also needed to go to the casino to exchange the bills, but not to go to crazy.
4. On July 4, 2020 at 9:03, Munford and Danfora spoke via telephone. Danfora told Munford said she is going to send the JPays now. She said she is going to send 3 to "K", 3 to "F", and 1 to him.

B. GTL (ELECTRONIC MESSAGES)

Between June 23, 2020 and August 13, 2020, there are approximately 50 GTL messages between Danfora and Munford. These electronic messages correspond with the telephone communications between the two parties. There are messages that contain the personal identifying information of Munford, Frederick Owens, Ramon Rios-Davila, Rahim Johnson, Christopher Mendoza, Sean Brown, Desuan Watson, and Whitney Wilson Heaps. Agent Grady read numerous messages between Munford and Danfora, in which Munford continued to question how Danfora was handling the filing of applications and the movement of money to the applicants. Munford was not a only providing pressure for more clear answers in his telephone calls with Danfora, but was applying the same pressure in his GTL messages.

In a message dated June 24, 2020, Munford wrote to Danfora "...I told u I'm tryna do 100 at least so let me kno your plans I already told u mine. Like what u going do wit all that? I'm listening to u maybe u have better plans then me? We have to talk about this as a team feel me talk to me more about what's going on. S I ain't tryna make this all about hat but u kno I need to kno these things its kind of important we kind of major and niggas be on my ass bought what they suppose to get."

C. LETTER CORRESPONDENCE



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In one communication, post marked June 24, 2020, Munford directs Danfora to “adjust the weeks or make it seem as tho the people I give you stoped working back when the pandemic started” in order to maximize the payments from PA Department of Labor. This letter indicates Munford has to send each person \$300 per their application. Munford instructed Danfora to go to Wal-Mart or CVS to use the money and to use different names for the cards.

In a letter postmarked July 9, 2020, Munford directed Danfora to use a “burner” telephone and public wi-fi connections near a hotel or mall when filing the PUA applications. [A burner telephone is a temporary, pre-paid telephone that can be purchased without a contract from a wireless service provider and could be discarded after a single use.] Within the communications, Munford provided the names, dates of birth, and social security numbers of Keith Richard Corprew, Frederick Owens, Rahim Johnson, Parisha Dayshon Parker, Whitney Wilson Heaps, Adrin Smack, Naseer Moultrie, Jonathan Grant Jackson Sr., Desuan Watson, Christopher Mendoza, Sean Brown, Raymond Painter, and Ramon Rios Davilla to Danfora for the purpose of filing PUA benefits. Munford instructed Danfora how to attempt to disguise her IP address, residence, and the transfer of funds from the PUA check or debit card payments issued after filing and being approved for benefits.

IV. FRAUDULENT CLAIMS

Agent Grady used the intelligence provided by Department of Corrections to investigate the claims of fraudulent Pandemic Unemployment Assistance (PUA) applications filed with the PA Department of Labor and Industry (PA DOL). Agent Grady provided the PA DOL with the personal identifying information of Munford, Danfora, and the inmates listed in the letters and messages, and telephone calls provided by DOC. As a result, PA DOL identified PUA applications for these individuals. A list of the fraudulent applications filed based on the DOC intelligence is listed in Table 1.

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Agent Grady received the application and payment information from the PA DOL regarding the claims filed on behalf of the identified inmates. PA DOL records show Keith Corprew aka Godwin Holiday was issued two checks for \$5,940 and \$3,150 and Frederick Owens was issued two checks for \$5,940 and \$2,450. As of September 18, 2020, these checks have not been cashed. The claimants received US Bank debit cards from the Pennsylvania Department of Treasury (Treasury). Agent Grady received the last four digits of the debit card(s) issued to the claimants. These records show that applications and payments for PUA were submitted between June 15, 2020 and July 7, 2020.

TABLE 1

Date of Application	Name of Applicant	Mailing Address	IP Address	Date of Incarceration	Last 4 of Debit Card	Total Funds Received
06/15/2020	Keith Corprew AKA Godwin Holliday	941 S Pine Street, York, PA 17403	99.203.81.117	10/21/2014	2491	\$10,520
06/18/2020	Nasseer Moultrie	941 S Pine Street, York, PA 17403	174.49.223.240	6/19/2019	8338	\$9,820
06/18/2020	Frederick Owens	941 S Pine Street, York, PA 17403	174.49.223.240	1/10/2017	6933	\$9,820
07/02/2020	Markal Munford	941 S Pine Street, York, PA 17403	174.49.223.240	2/12/2015	0586	\$12,125
07/07/2020	Jonathan Jackson	512 S Duke Street, York, PA 17403	12.216.248.130	1/22/2019	6144	\$0
07/07/2020	Desuan Watson	512 S Duke Street, York, PA 17403	12.216.248.130	9/6/2019	1722	\$0
07/07/2020	Adrin Smack	512 S Duke Street, York, PA 17403	12.216.248.130	12/12/2018	2969	\$0

PA DOL confirmed there were no applications on record for Christopher Mendoza, Whitney Heaps, and Rahim Johnson. PA DOL did identify filings for Parisha Parker, Whitney Heaps, Sean Brown, Raymond Painter, and Ramon Rios-Davilla, however; based on the IP addresses and information used on the applications, it appears these were filed by another party and were not included in this investigation.

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Agent Grady contacted DOC and confirmed the above individuals were incarcerated at the time of their applications and are still incarcerated at SCI Mahanoy as of September 18, 2020, with the exception of Adrin Smack. According to DOC, Smack was transferred to a correctional facility in Delaware on July 21, 2020. Agent Grady confirmed with PA DOL that the US Bank debit cards issued to Munford, Owens, Corprew, and Moultrie were mailed to 941 S Pine Street, York, PA 17403. The US Bank debit cards issued to Smack, Watson, and Jackson were mailed to 512 S Duke Street, York, PA 17403; however, these cards were not funded. As a part of this investigation, Agent Grady determined the current address for Wendy Danfora is 941 S Pine Street, York, PA 17403. Pennsylvania Department of Transportation also listed Danfora's address as 941 S Pine Street, York, PA 17403, which was recently issued on June 6, 2020.

DOC provided Agent Grady with the JPay (an online system in which inmates can receive money from friends and family while incarcerated) transactions of the above listed individuals. According to these records, Danfora sent payments to the below inmates [Table 2] using the JPay system.

TABLE 2					
Inmate Name	Payment Date	Payment Amount	JPAY Customer	Type of Payment	IP Address
Keith Corprew AKA Godwin Holliday	07/07/2020	\$200	Wendy R. Danfora	Credit Card	12.216.248.130
Markal Munford	07/07/2020	\$100	Wendy R. Danfora	Credit Card	12.216.248.130
Desaun Watson	07/10/2020	\$20	Wendy R. Danfora	Credit Card	174.49.223.240
Jonathan Jackson	07/10/2020	\$45	Wendy R. Danfora	Credit Card	174.49.223.240
Frederick Owens	07/23/2020	\$300	Wendy R. Danfora	Credit Card	99.203.202.74

Agent Grady reviewed the records provided by DOC and PA Department of Labor, which show there is a correlation between the IP Addresses used to submit applications and the submission of payments made to above listed inmate's JPay accounts. The records provided by PA Department of Labor show, an individual using IP Addresses 99.203.81.117, 174.49.223.240, and 12.216.248.130 submitted the applications. The DOC JPay records



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reflect an additional IP address of 99.203.202.74 was used for the payment involving Frederick Owens. Agent Grady conducted a search and determined that IP address 174.49.223.240 is owned by Comcast Cable Communications with a geographic location of York, Pennsylvania. Agent Grady obtained the Subscriber information from Comcast Cable Communications, which identified the subscriber of IP Address 174.49.223.240 as being Wendy Danfora located at 941 S Pine Street, York, PA 17404. According to Comcast Cable, the account is active as of September 8, 2020. IP addresses 99.203.81.117 and 99.203.202.74 were identified as being owned by Sprint Relay POP with a geographic location of Elkridge, Maryland. IP address 12.216.248.130 was identified as being owned by Hampton Inn Shrewsbury with a geographic location of New Freedom, PA. Agent Grady verified Danfora was a guest at the Hampton Inn Shrewsbury between July 6, 2020 and July 8, 2020. According to Matthew Wood, General Manager, only guests may access the internet, including wi-fi connection, for the Hampton Inn. Wood provided a copy of the invoice and billing information from Danfora's stay. The billing information indicates Chase Bank Prepaid Master Card ending in 7290 was used to pay for the stay. Wood indicated the records show the card was present for the transaction and that Danfora had to swipe the card herself on their payment kiosk during check-in.

Agent Grady identified additional fraudulent PUA claim filings. The PA Department of Labor and Industry provided additional records which correlate with the data provided in Tables 1 and 2. PA Department of Labor and Industry ran a report to identify PUA applications and weekly reporting that were filed using IP Address 174.49.223.240, which according to Comcast Cable records belongs to Wendy Danfora. The below listed individuals [Table 3] were identified as having fraudulent PUA claim filings and receiving funds from the program. Agent Grady heard on the telephone calls provided by DOC that Danfora informed Munford that she has been filing claims for other people, besides the names that he has provided her. Specifically, on June 26, 2020, Danfora told Munford that she files 11 weekly claims every Sunday. On June 12, 2020, Danfora informed

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Munford that she has filed applications for Donna Essis (Danfora's mother), and Waide Danfora (Danfora's brother). Waide Danfora has been incarcerated at York County Prison since January 24, 2020. On June 23, 2020, Danfora informed Munford that she was filing an application for Mark Munford, his father. PA Department of Labor and Industry confirmed the individuals listed in Table 3 did not qualify for the PUA benefits.

TABLE 3

Date of Application	Name of Applicant	Mailing Address	Registration IP Address	E-Mail Address	Last 4 of Debit Card	Total Funds Received
5/18/2020	Wendy Danfora	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	8106 and 3339	\$10,649
5/20/2020	Jonathan Navarro	713 N Franklin Street, York, PA 17404	99.203.203.18	Lordanu33@gmail.com	6139 and 9567	\$5,589
5/26/2020	Sierra Lewis	941 S Pine Street, York, PA 17404	174.49.223.240	Babers7291988@gmail.com	5430	\$16,290
5/31/2020	Donna Essis	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	2715	\$2,860
6/10/2020	Waide Danfora	941 S Pine Street, York, PA 17404	99.203.203.221	Wendyd912@gmail.com	7833	\$0
6/17/2020	Dorita Payne	132 S Poplar Street, Elizabethtown, PA 17022	174.49.223.240	Wendyd912@gmail.com	9656	
6/17/2020	Louis Grimes	731 S Pine Street, York, PA 17403	174.198.205.203	Lgrimes887@gmail.com	1805 and 8028	\$12,369
6/23/2020	Mark Munford	941 S Pine Street, York, PA 17403	99.203.203.2	marmmm@gmail.com	6148	\$0
6/29/2020	Shaylyn West	941 S Pine Street, York, PA 17403	12.216.248.130	Shay2020@gmail.com	1700	\$0
7/1/2020	Alicia Bethune	512 S Duke Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	6894 and 9041	\$12,125
7/2/2020	Anna Bethune	45 W Jackson Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	4020	\$13,380
7/2/2020	Christopher Simmons	512 S Duke Street, York, PA 17403	174.49.223.240	Chrisss2020@gmail.com	9358	\$11,075
7/7/2020	Akai Rosario	132 S Poplar Street, Elizabethtown, PA 17022	12.216.248.130	mommomkai@yahoo.com	2721	\$15,858



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Agent Grady received records from US Bank on September 17, 2020 in reference to the individuals listed in Table 1. Included in those records is the full debit card number issued by US Bank for each individual claim, the transaction history, and the IP Address history for any phone calls or online verifications made by the recipient of the debit card. An analysis of these records reflects the use of IP Address 174.49.223.240 being used for the debit cards issued to Keith Corprew, Frederick Owens, Naseer Moultrie, Markal Munford and Jonathan Jackson. The IP Address was used during the process to activate the card, which including establishing a pin number. The debit cards for Desuan Watson and Adrin Smack were de-activated after the claims were flagged by PA DOL. The subscriber of IP Address 174.49.223.240 was identified as Wendy Danfora. The transaction data for each debit card is as follows.

A. Keith Corprew aka Holliday Godwin US Bank Debit Card 4912881024972491

Debit Card ending in 2491, issued to Corprew was activated on 6/26/2020. The card was funded with PUA benefits on 6/24/2020 and 7/1/2020 for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA, and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Turkey Hill in York, PA, and Walgreens in York, PA. The card has a zero balance.

B. Frederick Owens US Bank Debit Card 4912881025286933

Debit Card ending in 6933, issued to Owens was activated on 6/26/2020. The card was funded with PUA benefits on 6/26/2020 and 7/1/2020, for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Sheetz, and Rutter's, located in York, PA. The card has a balance of \$0.53.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

C. Naseer Moultrie US Bank Debit Card 4912881025338338

Debit Card ending in 8338, issued to Moultrie was activated on 6/26/2020. The card was funded with PUA benefits on 6/23/2020, 6/26/2020, and 7/1/2020, for a total of \$9,820. After the deposits, CASH withdrawals were made at ATMs located at Woodforest National Bank 1000 Town Center Dr., York, PA; 720 Bow Creek Rd (Hollywood Casino), Grantville, PA; M&T Bank located at 1520 Penna Ave and 912 S Richland in York, PA; and PNC Bank located at 2068 Queen Street and 405 Memory Lane in York, PA. There were POS transactions at Wal-Mart, McDonalds, Sheetz, Giant, Auntie Anne's, Justice, GTL Inmate Phone, Five Below, Turkey Hill, Burger King, Hershey Lodge, Golden Beauty School, Sheetz, Dollar General, Higher Design, Chipotle, Rutter's, Taco Bell, and Shoe Department. The card has a zero balance.

D. Adrin Smack US Bank Debit Card 4912881029872969

Debit Card ending in 2969, issued to Smack, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

E. Desuan Watson US Bank Debit Card 4912881029871722

Debit Card ending in 1722, issued to Watson, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

F. Jonathan Jackson US Bank Debit Card 4912881029866144

Debit Card ending in 6144, issued to Jackson, was activated on 7/21/2020. The debit card did not receive funding from PUA benefit claims.

G. Markal Munford US Bank Debit Card 4912881029190586

Debit Card ending in 0586, issued to Munford, was activated on 7/23/2020. The debit card was funded on 7/10/2020, 7/15/2020, and 7/18/2020, for a total of \$11,950. After the deposits, CASH withdrawals

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

were made at PNC Banks located at 405 Memory Lane, York, PA, 2068 S Queen Street, York, PA, 215 Arsenal Road, York, PA and 1180 Manheim Pike, Lancaster, PA; and Wells Fargo Bank located at 2099 S Queen Street, York, PA. There were also POS transactions at Sheetz, Auntie Anne's, Dollar General, Wal-Mart, McDonald's, Bath and Body Works, H&M, Coca Cola, Boscov's, Wendy's, Turkey Hill, Five Below, Texas Roadhouse, GTL Inmate Phone, I Heart ICE-SQ, Roll R Way, Save A Lot, Chick-Fil-A, Double Tree Resort Lancaster, Lowe's, and Starbucks. The card has a zero balance.

Agent Grady conducted interviews at SCI Mahanoy with the inmates listed in Table 1. As a result of these interviews, two inmates informed Agent Grady that Markal Munford, also known as "Kellz", was actively talking about using the information of fellow inmates to file PUA applications through the PA DOL website. Munford indicated he had someone on the outside that was able to complete the filings on their behalf. One of these inmates admitted they had provided Munford their information, but claimed he did not know he was going to be using it to file a PUA application on his behalf. The inmate stated Munford claimed he needed the information to help him obtain employment upon his release from prison. The inmate explained he had received \$200 on his JPay from a Wendy Danfora, but did not know who that was. The inmate questioned Munford to see if he knew where the \$200 came from, but Munford did not confirm or deny why he had received the funds. Munford told the inmate to consider it a blessing that he received the funds on his JPay account.

V. CONCLUSION

Based on the facts and circumstances of this investigation, and your Affiant training and experience involving thefts and white collar crime investigations, your Affiant believes that Wendy Danfora and Markal Munford conspired together to benefit financially from the fraudulent Pandemic Unemployment Assistance benefit program operated by Pennsylvania Department of Labor and Industry, located at 651 Boas Street,



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

Harrisburg, PA 17121. The investigation, which included records provided by the PA DOL, Department of Corrections, Pennsylvania Treasury, and documentation obtained via Search Warrant, revealed Danfora filed 20 fraudulent PUA claims, to include her own, for persons that were not eligible for the PUA program based on the requirements set forth in Cares Act. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires, the acknowledgement that any false statements made on the application is a criminal offense.

The investigation also revealed attempts made by Danfora and Munford to conceal the source of the funds before adding money to the JPay accounts of the inmates whose names were used to file the applications. Munford and Danfora conspired to conceal the money by using cash withdrawals, prepaid cards, and the exchange of cash at casinos to avoid detection. The theft of funds from this activity total approximately \$153,470.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of their knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendants Wendy Danfora, Markal Munford, Frederick Owens, and Keith Corprew.

I, KATHRYN GRADY, 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.



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CL-23520</u>	Date Filed: <u>9/21/2020</u>	OTN/LiveScan Number <u>U915825-1</u>	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle: T	Last: MUNFORD

[Signature]

(Signature of Affiant)

Sworn to me and subscribed before me this

day of

September 2020

9/21/20

Date

[Signature]

, Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

FREDERICK

E

OWENS III

First Name

Middle Name

Last Name

SCI Mahanoy, 301 Morea Road
Frackville, PA 17932

Ge
n

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" 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>CR236-20</u>	Date Filed <u>09/22/2020</u>	OTN/LiveScan Number <u>U 9158021</u>	Complaint/Incident Number <u>OCC-20-0023</u>	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 <u>10/30/1988</u>	POB _____	Add'l DOB <u>/ /</u>	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA				

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

ETHNICITY ☐ Hispanic ☐ Non-Hispanic ☐ Unknown

<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 type="checkbox"/> BRO (Brown)
<input checked="" 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 ☐ 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: _____

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).

HEATHER CASTELLINO

(Name of the attorney for the Commonwealth)

Approved via Phone
 (Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, KATHRYN GRADY

(Name of the Affiant)

590

(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 [301] Harrisburg City
 (Subdivision Code) (Place/Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020



POLICE CRIMINAL COMPLAINT

Docket Number: CH2620	Date Filed: 9/24/20	OTM/LiveScan Number U915132-1	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	3921	A	of the	18 PA C.S.A.	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): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: To that the Defendant, a person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. To Wit: Wendy Danfora, Markal Munford, and others falsely filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and others, although they did not qualify for the benefits. Frederick Owens provided his Date of Birth and Social Security Number for the benefit program, to which \$9,820 was obtained.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	3921	A	of the	18 PA C.S.A.	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): **THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between May of 2020 and September of 2020, within the County of Dauphin, Schuylkill and York, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903. To Wit: Frederick Owens provided his Date of Birth and Social Security number for the benefit program, to which \$9,820 was obtained.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	3922	A2	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
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently perform the promise. To Wit: Wendy Danfora, Markal Munford, and others falsely filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. Frederick Owens provided his Date of Birth and Social Security number for the benefit program, to which \$9,820 was obtained.



POLICE CRIMINAL COMPLAINT

Docket Number: CR 236-20	Date Filed: 9/21/20	OTN/LiveScan Number U 9158321	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	4 Offense#	3922 Section	A2 Subsection	of the	18 PA C.S.A. PA Statute (Title)	1 Counts	F3 Grade	NCIC Offense Code	UCR/NIBRS Code
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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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant did intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. To Wit: Wendy Danfora, Markal Munford and others falsely filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for themselves and other individuals, although they did not qualify for the benefits. Frederick Owens provided his Date of Birth and Social Security Number for the benefit program, to which \$9,820 was obtained.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	3925 Offense#	A Section	of the	18 PA.C.S.A. PA Statute (Title)	1 Counts	F3 Grade	NCIC Offense Code	UCR/NIBRS Code
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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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant, Wendy Danfora, is guilty of theft if she intentionally receives, retains, or disposes of movable propert of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. To Wit: Wendy Danfora, Markal Munford, and others falsely filed for Pandemic Unemployment Assistance benefits program through the Pennsylvania Labor and Industry website for herself and multiple other individuals, although they did not qualify for the Pandemic Unemployment Assistance benefits. Frederick Owens provided his Date of Birth and Social Security Number for the benefit program, to which \$9,820 was obtained.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	Offense#	Section	Subsection	of the	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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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):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CL230-20</u>	Date Filed: <u>9/21/20</u>	OTN/LiveScan Number <u>U915832-1</u>	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

- 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.)

9/21/2020

(Signature of Affiant)

(Date) _____ (Year) _____

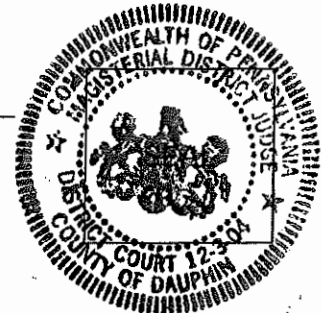
AND NOW, on this date 9/21/2020 I certify that the complaint has been properly completed and verified.

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

12304

(Magisterial District Court Number)

(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Kathryn Grady of the Pennsylvania Office of Attorney General (OAG), being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Kathryn Grady, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation, and is empowered by law to conduct investigations and make arrests relating to white-collar crimes, theft, fraud, and other violations of Pennsylvania Law. Your Affiant currently holds the designation of "Certified Fraud Examiner" and has conducted numerous investigations involving financial crimes. Your Affiant has received training in electronic surveillance by the Pennsylvania State Police in accordance with the Pennsylvania Wiretapping and electronic Surveillance Control Act. This training resulted in the issuance of a class "A" certification, authorizing your Affiant to conduct criminal investigations using various wiretapping equipment, as authorized by Chapter 57 of the Pennsylvania Crimes Code. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5948. Your Affiant has been so employed since January 2018 and is currently assigned to the Financial Crime Section in Harrisburg, Pennsylvania. Prior to employment with the Pennsylvania Office of Attorney General, your Affiant was employed as a Security Investigator at First National Bank of Pennsylvania (formerly Metro Bank) and conducted fraud investigations with the Pennsylvania Office of Inspector General.

Based upon your Affiant's law enforcement experience and training, your Affiant is familiar with the manner in which various crimes are committed in the Commonwealth relating to public corruption, white collar crimes, theft and fraud. Based upon the foregoing training and experience, your Affiant has special expertise regarding the practices of, and techniques used by, these offenders.

II. BACKGROUND OF INVESTIGATION

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry, located at 651 Boast Street, Harrisburg, PA 17121, administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: "Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

III. INVESTIGATION

Agent Grady received information from the Pennsylvania Department of Corrections (DOC), relating to an internal investigation they conducted where it was determined Markal Munford, an inmate at State Correctional Institute (SCI) Mahanoy, located at 301 Morea Rd, Frackville, PA 17932, was providing the names and personal identification of fellow inmates to Wendy Danfora. According to the information received from DOC, Munford instructed Danfora to use the information to file for PUA benefits on the behalf of himself and other inmates. DOC provided Agent Grady copies of the communications between Munford and Danfora.

Agent Grady reviewed these documents and learned between June and August 2020, Munford and Danfora communicated through letters, telephone calls, and electronic messages in reference to the filing of PUA benefits on behalf of inmates. In these communications Munford provided Danfora instructions on who to file applications for, how to file them, and how to move the money once she received the checks or debit cards in the mail. During many of the communications, there were issues between Munford and Danfora due to the slow pace in which Danfora filed these applications. Munford had concerns with how Danfora was handling the payout of the claims since it seemed she was slow to forward the money to the named applicant. Danfora indicated at times that she was struggling to cash checks and transfer money to other parties via Cash App. Danfora often stated she was having issues with the websites when trying to deposit the checks or move money. Danfora would tell Munford that she used Wal-Mart to send money as instructed. An outline of these communications has been provided below.

A. TELEPHONE COMMUNICATIONS

Agent Grady reviewed approximately 130 telephone conversations between Munford and Danfora that took place between May 16, 2020 and September 15, 2020. Below are details from some of their conversations

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relevant to this investigation. In three of these telephone calls, Munford provided Danfora the personal identifying information for inmates Keith Corprew, Frederick Owens, Naseer Moultrie, and Rahim Johnson. Munford told Danfora on several phone calls that he mailed her a letter with instructions on how to handle the information he has provided her. On several of the phone calls, Danfora told Munford that she has filed applications for his father, Mark Munford, her mother, Donna Essis, and her brother, Waide Danfora. Below are examples of these telephone conversations had between Munford and Danfora.

1. On June 23, 2020 at 7:33, Munford and Danfora spoke via telephone. Danfora stated one of the plastic was sent back due to an issue with the mailing address, but that she called and answered the security questions correctly so they will be sending her a new one. Danfora asked Munford for the identifying information for the other two that she did to set them up with an account. Munford asked whose information he needed to get for her. Danfora said for "F" and "N". Danfora wanted the information in case they received paper. Munford stated she needs to watch the mail for his letter and that he has more people for her to handle. Munford told Danfora once they see the paper; they are going to start flooding it.
2. On June 26, 2020 at 14:00, Munford and Danfora spoke via telephone. Danfora said she received his letter today. Munford asked if she was going to be able to handle what he sent her, to which Danfora said yes. Danfora confirmed she completed filings for "K", "N", and "F", Munford asked if she filed for "R". Danfora said she must have missed that one and to send her the information. Munford told her there should have been information for an "R" and a "J" before she filed his information. Danfora said she has only done three and his application. Munford told Danfora she has to be on it better because there are hipsters there and they are going through things quickly. Danfora explained how the weekly claim filings worked and told him that she has to do 11 of them every Sunday. Once she files, then the cards are normally funded by Thursday.

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3. On July 3, 2020 at 20:01, Munford and Danfora spoke via telephone. During this call, Munford said she needed to send money to Dee and to Keisha then send money to Keith or she needed to send money directly to Keith. Danfora said she set herself up with an online "john" at Wells. Munford said she also needed to go to the casino to exchange the bills, but not to go to crazy.
4. On July 4, 2020 at 9:03, Munford and Danfora spoke via telephone. Danfora told Munford said she is going to send the JPays now. She said she is going to send 3 to "K", 3 to "F", and 1 to him.

B. GTL (ELECTRONIC MESSAGES)

Between June 23, 2020 and August 13, 2020, there are approximately 50 GTL messages between Danfora and Munford. These electronic messages correspond with the telephone communications between the two parties. There are messages that contain the personal identifying information of Munford, Frederick Owens, Ramon Rios-Davila, Rahim Johnson, Christopher Mendoza, Sean Brown, Desuan Watson, and Whitney Wilson Heaps. Agent Grady read numerous messages between Munford and Danfora, in which Munford continued to question how Danfora was handling the filing of applications and the movement of money to the applicants. Munford was not a only providing pressure for more clear answers in his telephone calls with Danfora, but was applying the same pressure in his GTL messages.

In a message dated June 24, 2020, Munford wrote to Danfora "...I told u I'm tryna do 100 at least so let me kno your plans I already told u mine. Like what u going do wit all that? I'm listening to u maybe u have better plans then me? We have to talk about this as a team feel me talk to me more about what's going on. S I ain't tryna make this all about hat but u kno I need to kno these things its kind of important we kind of major and niggas be on my ass bought what they suppose to get."

C. LETTER CORRESPONDENCE



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In one communication, post marked June 24, 2020, Munford directs Danfora to “adjust the weeks or make it seem as tho the people I give you stoped working back when the pandemic started” in order to maximize the payments from PA Department of Labor. This letter indicates Munford has to send each person \$300 per their application. Munford instructed Danfora to go to Wal-Mart or CVS to use the money and to use different names for the cards.

In a letter postmarked July 9, 2020, Munford directed Danfora to use a “burner” telephone and public wi-fi connections near a hotel or mall when filing the PUA applications. [A burner telephone is a temporary, pre-paid telephone that can be purchased without a contract from a wireless service provider and could be discarded after a single use.] Within the communications, Munford provided the names, dates of birth, and social security numbers of Keith Richard Corprew, Frederick Owens, Rahim Johnson, Parisha Dayshon Parker, Whitney Wilson Heaps, Adrin Smack, Naseer Moultrie, Jonathan Grant Jackson Sr., Desuan Watson, Christopher Mendoza, Sean Brown, Raymond Painter, and Ramon Rios Davilla to Danfora for the purpose of filing PUA benefits. Munford instructed Danfora how to attempt to disguise her IP address, residence, and the transfer of funds from the PUA check or debit card payments issued after filing and being approved for benefits.

IV. FRAUDULENT CLAIMS

Agent Grady used the intelligence provided by Department of Corrections to investigate the claims of fraudulent Pandemic Unemployment Assistance (PUA) applications filed with the PA Department of Labor and Industry (PA DOL). Agent Grady provided the PA DOL with the personal identifying information of Munford, Danfora, and the inmates listed in the letters and messages, and telephone calls provided by DOC. As a result, PA DOL identified PUA applications for these individuals. A list of the fraudulent applications filed based on the DOC intelligence is listed in Table 1.

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Agent Grady received the application and payment information from the PA DOL regarding the claims filed on behalf of the identified inmates. PA DOL records show Keith Corprew aka Godwin Holiday was issued two checks for \$5,940 and \$3,150 and Frederick Owens was issued two checks for \$5,940 and \$2,450. As of September 18, 2020, these checks have not been cashed. The claimants received US Bank debit cards from the Pennsylvania Department of Treasury (Treasury). Agent Grady received the last four digits of the debit card(s) issued to the claimants. These records show that applications and payments for PUA were submitted between June 15, 2020 and July 7, 2020.

TABLE 1

Date of Application	Name of Applicant	Mailing Address	IP Address	Date of Incarceration	Last 4 of Debit Card	Total Funds Received
06/15/2020	Keith Corprew AKA Godwin Holliday	941 S Pine Street, York, PA 17403	99.203.81.117	10/21/2014	2491	\$10,520
06/18/2020	Nasseer Moultrie	941 S Pine Street, York, PA 17403	174.49.223.240	6/19/2019	8338	\$9,820
06/18/2020	Frederick Owens	941 S Pine Street, York, PA 17403	174.49.223.240	1/10/2017	6933	\$9,820
07/02/2020	Markal Munford	941 S Pine Street, York, PA 17403	174.49.223.240	2/12/2015	0586	\$12,125
07/07/2020	Jonathan Jackson	512 S Duke Street, York, PA 17403	12.216.248.130	1/22/2019	6144	\$0
07/07/2020	Desuan Watson	512 S Duke Street, York, PA 17403	12.216.248.130	9/6/2019	1722	\$0
07/07/2020	Adrin Smack	512 S Duke Street, York, PA 17403	12.216.248.130	12/12/2018	2969	\$0

PA DOL confirmed there were no applications on record for Christopher Mendoza, Whitney Heaps, and Rahim Johnson. PA DOL did identify filings for Parishā Parker, Whitney Heaps, Sean Brown, Raymond Painter, and Ramon Rios-Davilla, however; based on the IP addresses and information used on the applications, it appears these were filed by another party and were not included in this investigation.

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Agent Grady contacted DOC and confirmed the above individuals were incarcerated at the time of their applications and are still incarcerated at SCI Mahanoy as of September 18, 2020, with the exception of Adrin Smack. According to DOC, Smack was transferred to a correctional facility in Delaware on July 21, 2020. Agent Grady confirmed with PA DOL that the US Bank debit cards issued to Munford, Owens, Corprew, and Moultrie were mailed to 941 S Pine Street, York, PA 17403. The US Bank debit cards issued to Smack, Watson, and Jackson were mailed to 512 S Duke Street, York, PA 17403; however, these cards were not funded. As a part of this investigation, Agent Grady determined the current address for Wendy Danfora is 941 S Pine Street, York, PA 17403. Pennsylvania Department of Transportation also listed Danfora's address as 941 S Pine Street, York, PA 17403, which was recently issued on June 6, 2020.

DOC provided Agent Grady with the JPay (an online system in which inmates can receive money from friends and family while incarcerated) transactions of the above listed individuals. According to these records, Danfora sent payments to the below inmates [Table 2] using the JPay system.

TABLE 2					
Inmate Name	Payment Date	Payment Amount	JPAY Customer	Type of Payment	IP Address
Keith Corprew AKA Godwin Holliday	07/07/2020	\$200	Wendy R. Danfora	Credit Card	12.216.248.130
Markal Munford	07/07/2020	\$100	Wendy R. Danfora	Credit Card	12.216.248.130
Desaun Watson	07/10/2020	\$20	Wendy R. Danfora	Credit Card	174.49.223.240
Jonathan Jackson	07/10/2020	\$45	Wendy R. Danfora	Credit Card	174.49.223.240
Frederick Owens	07/23/2020	\$300	Wendy R. Danfora	Credit Card	99.203.202.74

Agent Grady reviewed the records provided by DOC and PA Department of Labor, which show there is a correlation between the IP Addresses used to submit applications and the submission of payments made to above listed inmate's JPay accounts. The records provided by PA Department of Labor show, an individual using IP Addresses 99.203.81.117, 174.49.223.240, and 12.216.248.130 submitted the applications. The DOC JPay records

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reflect an additional IP address of 99.203.202.74 was used for the payment involving Frederick Owens. Agent Grady conducted a search and determined that IP address 174.49.223.240 is owned by Comcast Cable Communications with a geographic location of York, Pennsylvania. Agent Grady obtained the Subscriber information from Comcast Cable Communications, which identified the subscriber of IP Address 174.49.223.240 as being Wendy Danfora located at 941 S Pine Street, York, PA 17404. According to Comcast Cable, the account is active as of September 8, 2020. IP addresses 99.203.81.117 and 99.203.202.74 were identified as being owned by Sprint Relay POP with a geographic location of Elkridge, Maryland. IP address 12.216.248.130 was identified as being owned by Hampton Inn Shrewsbury with a geographic location of New Freedom, PA. Agent Grady verified Danfora was a guest at the Hampton Inn Shrewsbury between July 6, 2020 and July 8, 2020. According to Matthew Wood, General Manager, only guests may access the internet, including wi-fi connection, for the Hampton Inn. Wood provided a copy of the invoice and billing information from Danfora's stay. The billing information indicates Chase Bank Prepaid Master Card ending in 7290 was used to pay for the stay. Wood indicated the records show the card was present for the transaction and that Danfora had to swipe the card herself on their payment kiosk during check-in.

Agent Grady identified additional fraudulent PUA claim filings. The PA Department of Labor and Industry provided additional records which correlate with the data provided in Tables 1 and 2. PA Department of Labor and Industry ran a report to identify PUA applications and weekly reporting that were filed using IP Address 174.49.223.240, which according to Comcast Cable records belongs to Wendy Danfora. The below listed individuals [Table 3] were identified as having fraudulent PUA claim filings and receiving funds from the program. Agent Grady heard on the telephone calls provided by DOC that Danfora informed Munford that she has been filing claims for other people, besides the names that he has provided her. Specifically, on June 26, 2020, Danfora told Munford that she files 11 weekly claims every Sunday. On June 12, 2020, Danfora informed

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Munford that she has filed applications for Donna Essis (Danfora's mother), and Waide Danfora (Danfora's brother). Waide Danfora has been incarcerated at York County Prison since January 24, 2020. On June 23, 2020, Danfora informed Munford that she was filing an application for Mark Munford, his father. PA Department of Labor and Industry confirmed the individuals listed in Table 3 did not qualify for the PUA benefits.

TABLE 3

Date of Application	Name of Applicant	Mailing Address	Registration IP Address	E-Mail Address	Last 4 of Debit Card	Total Funds Received
5/18/2020	Wendy Danfora	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	8106 and 3339	\$10,649
5/20/2020	Jonathan Navarro	713 N Franklin Street, York, PA 17404	99.203.203.18	Lordanu33@gmail.com	6139 and 9567	\$5,589
5/26/2020	Sierra Lewis	941 S Pine Street, York, PA 17404	174.49.223.240	Babers7291988@gmail.com	5430	\$16,290
5/31/2020	Donna Essis	941 S Pine Street, York, PA 17404	174.49.223.240	Wendyd912@gmail.com	2715	\$2,860
6/10/2020	Waide Danfora	941 S Pine Street, York, PA 17404	99.203.203.221	Wendyd912@gmail.com	7833	\$0
6/17/2020	Dorita Payne	132 S Poplar Street, Elizabethtown, PA 17022	174.49.223.240	Wendyd912@gmail.com	9656	
6/17/2020	Louis Grimes	731 S Pine Street, York, PA 17403	174.198.205.203	Lgrimes887@gmail.com	1805 and 8028	\$12,369
6/23/2020	Mark Munford	941 S Pine Street, York, PA 17403	99.203.203.2	marmmm@gmail.com	6148	\$0
6/29/2020	Shaylyn West	941 S Pine Street, York, PA 17403	12.216.248.130	Shay2020@gmail.com	1700	\$0
7/1/2020	Alicia Bethune	512 S Duke Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	6894 and 9041	\$12,125
7/2/2020	Anna Bethune	45 W Jackson Street, York, PA 17403	12.216.248.130	Abethune45@gmail.com	4020	\$13,380
7/2/2020	Christopher Simmons	512 S Duke Street, York, PA 17403	174.49.223.240	Chrisss2020@gmail.com	9358	\$11,075
7/7/2020	Akai Rosario	132 S Poplar Street, Elizabethtown, PA 17022	12.216.248.130	mommomkai@yahoo.com	2721	\$15,858

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Agent Grady received records from US Bank on September 17, 2020 in reference to the individuals listed in Table 1. Included in those records is the full debit card number issued by US Bank for each individual claim, the transaction history, and the IP Address history for any phone calls or online verifications made by the recipient of the debit card. An analysis of these records reflects the use of IP Address 174.49.223.240 being used for the debit cards issued to Keith Corprew, Frederick Owens, Naseer Moultrie, Markal Munford and Jonathan Jackson. The IP Address was used during the process to activate the card, which including establishing a pin number. The debit cards for Desuan Watson and Adrin Smack were de-activated after the claims were flagged by PA DOL. The subscriber of IP Address 174.49.223.240 was identified as Wendy Danfora. The transaction data for each debit card is as follows.

A. Keith Corprew aka Holliday Godwin US Bank Debit Card 4912881024972491

Debit Card ending in 2491, issued to Corprew was activated on 6/26/2020. The card was funded with PUA benefits on 6/24/2020 and 7/1/2020 for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA, and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Turkey Hill in York, PA, and Walgreens in York, PA. The card has a zero balance.

B. Frederick Owens US Bank Debit Card 4912881025286933

Debit Card ending in 6933, issued to Owens was activated on 6/26/2020. The card was funded with PUA benefits on 6/26/2020 and 7/1/2020, for a total of \$1,430. After the deposits, CASH withdrawals were made at ATMs located at PNC Bank located at 405 Memory Lane, York, PA and M&T Bank located at 1520 Penna Ave in York, PA and POS transactions at PBC Harrisburg, Sheetz, and Rutter's, located in York, PA. The card has a balance of \$0.53.

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C. Naseer Moultrie US Bank Debit Card 4912881025338338

Debit Card ending in 8338, issued to Moultrie was activated on 6/26/2020. The card was funded with PUA benefits on 6/23/2020, 6/26/2020, and 7/1/2020, for a total of \$9,820. After the deposits, CASH withdrawals were made at ATMs located at Woodforest National Bank 1000 Town Center Dr., York, PA; 720 Bow Creek Rd (Hollywood Casino), Grantville, PA; M&T Bank located at 1520 Penna Ave and 912 S Richland in York, PA; and PNC Bank located at 2068 Queen Street and 405 Memory Lane in York, PA. There were POS transactions at Wal-Mart, McDonalds, Sheetz, Giant, Auntie Anne's, Justice, GTL Inmate Phone, Five Below, Turkey Hill, Burger King, Hershey Lodge, Golden Beauty School, Sheetz, Dollar General, Higher Design, Chipotle, Rutter's, Taco Bell, and Shoe Department. The card has a zero balance.

D. Adrin Smack US Bank Debit Card 4912881029872969

Debit Card ending in 2969, issued to Smack, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

E. Desuan Watson US Bank Debit Card 4912881029871722

Debit Card ending in 1722, issued to Watson, was mailed on 7/14/2020, but not activated. The debit card did not receive funding from PUA benefit claims.

F. Jonathan Jackson US Bank Debit Card 4912881029866144

Debit Card ending in 6144, issued to Jackson, was activated on 7/21/2020. The debit card did not receive funding from PUA benefit claims.

G. Markal Munford US Bank Debit Card 4912881029190586

Debit Card ending in 0586, issued to Munford, was activated on 7/23/2020. The debit card was funded on 7/10/2020, 7/15/2020, and 7/18/2020, for a total of \$11,950. After the deposits, CASH withdrawals

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were made at PNC Banks located at 405 Memory Lane, York, PA, 2068 S Queen Street, York, PA, 215 Arsenal Road, York, PA and 1180 Manheim Pike, Lancaster, PA; and Wells Fargo Bank located at 2099 S Queen Street, York, PA. There were also POS transactions at Sheetz, Auntie Anne's, Dollar General, Wal-Mart, McDonald's, Bath and Body Works, H&M, Coca Cola, Boscov's, Wendy's, Turkey Hill, Five Below, Texas Roadhouse, GTL Inmate Phone, I Heart ICE-SQ, Roll R Way, Save A Lot, Chick-Fil-A, Double Tree Resort Lancaster, Lowe's, and Starbucks. The card has a zero balance.

Agent Grady conducted interviews at SCI Mahanoy with the inmates listed in Table 1. As a result of these interviews, two inmates informed Agent Grady that Markal Munford, also known as "Kellz", was actively talking about using the information of fellow inmates to file PUA applications through the PA DOL website. Munford indicated he had someone on the outside that was able to complete the filings on their behalf. One of these inmates admitted they had provided Munford their information, but claimed he did not know he was going to be using it to file a PUA application on his behalf. The inmate stated Munford claimed he needed the information to help him obtain employment upon his release from prison. The inmate explained he had received \$200 on his JPay from a Wendy Danfora, but did not know who that was. The inmate questioned Munford to see if he knew where the \$200 came from, but Munford did not confirm or deny why he had received the funds. Munford told the inmate to consider it a blessing that he received the funds on his JPay account.

V. CONCLUSION

Based on the facts and circumstances of this investigation, and your Affiant training and experience involving thefts and white collar crime investigations, your Affiant believes that Wendy Danfora and Markal Munford conspired together to benefit financially from the fraudulent Pandemic Unemployment Assistance benefit program operated by Pennsylvania Department of Labor and Industry, located at 651 Boas Street,

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Harrisburg, PA 17121. The investigation, which included records provided by the PA DOL, Department of Corrections, Pennsylvania Treasury, and documentation obtained via Search Warrant, revealed Danfora filed 20 fraudulent PUA claims, to include her own, for persons that were not eligible for the PUA program based on the requirements set forth in Cares Act. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires, the acknowledgement that any false statements made on the application is a criminal offense.

The investigation also revealed attempts made by Danfora and Munford to conceal the source of the funds before adding money to the JPay accounts of the inmates whose names were used to file the applications. Munford and Danfora conspired to conceal the money by using cash withdrawals, prepaid cards, and the exchange of cash at casinos to avoid detection. The theft of funds from this activity total approximately \$153,470.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of their knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendants Wendy Danfora, Markal Munford, Frederick Owens, and Jonathan Jackson.

I, KATHRYN GRADY, 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.



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Defendant Name:	First: FREDERICK	Middle: E	Last: OWENS III

K. Shady

(Signature of Affiant)

Sworn to me and subscribed before me this

9/21/20

Date

21 day of September 2020

, Magisterial District Judge

My commission expires first Monday of January,



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ Name: Hon. DOMINIC PELINO
Address: 576 EAST MAIN STREET
HUMMELSTOWN, PA 17036
Telephone: (717) 583-1912

DEFENDANT: (NAME and ADDRESS):
DEXTER PITTS

First Name Middle Name Last Name Gen.
SCI PHOENIX
1200 MOKYCHIC ROAD
COLLEGEVILLE, PA 19426

NCIC EXTRADITION CODE TYPE

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pend.	<input type="checkbox"/> C-Misdemeanor Surrounding States	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

Pocket Number: CK 240-20 Date Filed: 09/22/20 OTN/LiveScan Number: U9158794 Complaint/Incident Number: OCE-20-0030-1 Request Lab Services? ☐ YES ☒ NO

GENDER ☒ Male ☐ Female **DOB** 09/17/1958 **POB** KEVIN **Add'l DOB** PERRY **Co-Defendant(s)** ☐

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

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR ☒ GRY (Gray) ☐ RED (Red / Auburn) ☐ 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** UNKNOWN

FBI Number **MNU Number** **Ft. HEIGHT In.** 6 1

Defendant Fingerprinted ☐ YES ☒ NO

Fingerprint Classification:

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"/>
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VIN	Year	Make	Model	Style	Color
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Office of the Attorney for the Commonwealth ☒ Approved ☐ Disapproved because: Approved via Phone
(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. Pa.R.Crim.P. 607.)

SDAG HEATHER CASTELLINO 09/22/2020
(Name of Attorney for Commonwealth - Please Print or Type) (Signature of Attorney for Commonwealth) (Date)

I, SPECIAL AGENT ROBERT MCHUGH #516
(Name of Affiant - Please Print or Type) (PSP/PMOETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania Office of Attorney General and Pennsylvania State Police. PA0222400
(Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

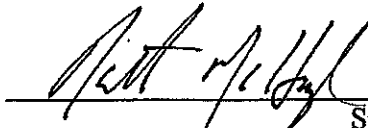
- ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as
☐ I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe or Jane Doe.

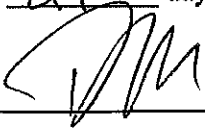
with violating the penal laws of the Commonwealth of Pennsylvania at: 301 PA DEPARTMENT OF LABOR & INDUSTRY, 651
(Subdivision Code) (Place/Political Subdivision)
BOAS STREET, HARRISBURG, PA 17121

in DAUPHIN County 22 on or about JULY 2, 2020 TO AUGUST 6, 2020
(County Code) (Offense Date)

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of his knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant, Dexter Pitts a/k/a Kevin Perry.

I, SA ROBERT MCHUGH #516, 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.


Special Agent

Sworn to me and subscribed this 21 day of September
9/21/20 Date , Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 12-3-04
MDJ Name: Hon. DOMINIC PELINO
Address: 576 EAST MAIN STREET
HUMMELSTOWN, PA
17036
Telephone: (717) 583-1912

DEFENDANT: (NAME and ADDRESS):
JERMAINE PLUMER
First Name Middle Name Last Name Gen.
SCI PHOENIX
1200 MOKYCHIC ROAD
COLLEGEVILLE, PA 19426

NCIC EXTRADITION CODE TYPE

☒ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States Distance:
☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending
☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CK-239720 Date Filed 09/22/20 OTN/LiveScan Number U915867-1 Complaint/Incident Number OCE-20-0052 Request Lab Services? ☐ YES ☒ NO

GENDER ☒ Male ☐ Female DOB 04/12/1981 POB AKA Add'l DOB First Name: Middle Name: Last Name: Gen.

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

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR ☐ GRY (Gray) ☐ RED (Red / Auburn) ☐ 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 UNKNOWN

FBI Number MNU Number FL HEIGHT 5 11

Defendant Fingerprinted ☐ YES ☒ NO

Fingerprint Classification: 5 11

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: Approved via Phone
(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. Pa.R.Crim.P. 607.)

SDAG HEATHER CASTELLINO
(Name of Attorney for Commonwealth - Please Print or Type)

Approved via Phone
(Signature of Attorney for Commonwealth)

09/22/2020
(Date)

I, SPECIAL AGENT ROBERT MCHUGH
(Name of Affiant - Please Print or Type)

#516
(PSP/MP/OTC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania Office of Attorney General and Pennsylvania State Police.
(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 is 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 PA DEPARTMENT OF LABOR & INDUSTRY, 651
(Subdivision Code) BOAS STREET, HARRISBURG, PA 17121
(Place/Political Subdivision)

In DAUPHIN County

22
(County Code)

on or about JULY 1, 2020 TO SEPTEMBER 4, 2020
(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CL-239-20	Date Filed: 09/22/20	OTN/LiveScan Number CL 915867-1	Complaint/Incident Number OCE-20-0052
Defendant Name	First: JERMAINE	Middle:	Last: PLUMER

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 80 or Older: 0
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<input checked="" type="checkbox"/> Lead?	1	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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:

The Defendant unlawfully took or exercised unlawful control over movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. TO WIT: During the COVID-19 pandemic, Jermaine PLUMER, and others on his behalf, falsley filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website even though PLUMER and the other applicants did not qualify for those funds.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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 CONSPIRACY - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, during the time frame above, within the County of Dauphin, Montgomery and Philadelphia, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903..



POLICE CRIMINAL COMPLAINT

Docket Number: C239-20	Date Filed: 09/22/20	OTN/LiveScan Number: U915867-1	Complaint/Incident Number OCE-20-0052
Defendant Name	First: JERMAINE	Middle:	Last: PLUMER

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	7512	(a)	of the	Title 18, PA Crimes Code	3	F3		
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):

CRIMINAL USE OF A COMMUNICATION FACILITY

Acts of the accused associated with this Offense:

In that the Defendant, 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 or under the act of April 14, 1972 (P.L.233, No.64), known as the Controll Substance Drug, Device and Cosmetic Act. TO WIT: On three separate occasions, Jermaine PLUMER and others utilized electronic communications through the Department of Corrections SCI Phoenix electronic messaging system to send names, dates of birth and social security numbers to be used to submit fraudulent Pandemic Unemployment Assistance applications on the PA Department of Labor and Industry Website.

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: 0
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<input type="checkbox"/> Lead?	4	3922	(a)(3)	of the	Title 18, PA Crimes Code	1	F3		
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:

In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Jermaine PLUMER and others falsely filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for PLUMER and others even though PLUMER and the other applicants did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct. The PA Department of Labor and Industry sent a total of \$18,264.00 of PUA funds based off of the information provided by PLUMER to his co-conspirator(s).



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CL-2391-20</i>	Date Filed: 09/22/20	OTN/LiveScan Number <i>U 915867-1</i>	Complaint/Incident Number OCE-20-0052
Defendant Name	First: JERMAINE	Middle:	Last: PLUMER

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	3922	(a)(3)	of the	Title 18, PA Crimes Code	1	F3		
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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 CONSPIRACY – THEFT BY DECEPTION

Acts of the accused associated with this Offense:

In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Jermaine PLUMER and others falsely filed an application for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for PLUMER even though he did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct. The PA Department of Labor and Industry sent a total of \$18,264.00 of PUA funds based off of the information provided by PLUMER to his co-conspirator(s).

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: 0
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<input type="checkbox"/> Lead?				of the					
--------------------------------	--	--	--	--------	--	--	--	--	--

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: <u>CH23920</u>	Date Filed: 09/22/20	OTN/LiveScan Number <u>U915867-1</u>	Complaint/Incident Number OCE-20-0052
Defendant Name	First: JERMAINE	Middle:	Last: PLUMER

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. §4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 3
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently 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.)

SEPTEMBER 22, 2020
(Date)

(Signature of Affiant)

AND NOW, on this date, 9/21/2020 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.

12304
(Magisterial District Court Number)

(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA

v.

Jermaine Plumer

AFFIDAVIT OF PROBABLE CAUSE

Your Affiant, Special Agent Robert McHugh, Office of Attorney General, Bureau of Criminal Investigations being duly sworn, deposes and says:

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the **Pandemic Unemployment Assistance (PUA)** program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: **"Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being**

paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution."

On June 1, 2020, the OAG received a referral letter from the Governor's Office requesting that this agency investigate instances of PUA fraud.

FINDINGS OF FACT

Jermaine Plumer was convicted of Murder on August 4, 2005 and sentenced to life in prison. Plumer is currently incarcerated at State Correctional Institution – Phoenix, located at 1200 Mokychic Road, Collegeville, PA 19426. Plumer has remained in custody since December 2, 2003 and has no record of employment according to PA Department of Labor and Industry (L&I) records.

While incarcerated at SCI Phoenix, Plumer has the ability to communicate with individuals outside of prison using the telephone, U.S. Mail or electronic messages through a GTL tablet. All of these methods of communication are monitored by PA Department of Corrections staff. Plumer has had multiple messages "flagged" by PA Department of Corrections staff related to potential PUA fraud.

On July 1, 2020 at 5:03pm, Plumer sent an electronic message through his GTL tablet to an individual identified as J ohhny Thomas: "yea I got just acouple more including mines ard!

Kareem harper'el xxx-xx-2453(7-9-83),Domonique McKinney xxx-xx-6122(11-13-85) Jermaine Plumer xxx-xx-8734(4-12-81) goodlookn holla at you later tonite!!! BPL!!! any issues hit me and lemme know ard!!!”

On July 1, 2020 at 8:52pm, Plumer sent an electronic message through his GTL tablet to an individual identified as Michael Van: “martez windle#xxx-xx-2142(don't know bdate)___franklin Johnson#xxx-xx-7318(10-24-84)___Jayver perry#xxx-xx-9994(6-1080) make sure folks take care of business bro!!! Holla at me!!! BPL my nigga...”

On July 6, 2020 at 5:33pm, Plumer sent an electronic message through his GTL tablet to an individual identified as Antonio Joyner: “yea my man wanna send his on da line not this, so here go 2 rite now___ James.m.Taylor___ Harrisburg pa 17104___(6-18-71)#xxx-xx-2775___(general temps).....!!!(___ Lawrence Jackson (1-16-63)#xxx-xx-7982 da other one gonna be on da line ard!!!!”

Furthermore, Plumer receives electronic messages stating that names, social security numbers and dates of birth can “guarantee” anywhere between \$2,500 and \$5,000 Pandemic Unemployment Assistance.

Plumer relays the “guaranteed” payment information back to Johnny Thomas in a message on July 6, 2020 at 11:37am : “Yea dat was good money wit dem new style nikes like some retro type shit, how long is it going to take to get cashed out on dat last pair? And yea I got a few cats tryn to ball but da ticket way to low ain't nobody gon budge for just 1 dolla when you got bulls scream 2500 to 5 dollars easy namean niggas pretty much in da loop so see if da coach can lace them joints up a lil betta ard! Holla at me homie!!! BPL always maino.”

Johnny Thomas responds to Plumer on July 6, 2020 at 10:07pm: "gotchu.. to many ppl be having they hand in the cookie har feel me.. ima try n make that happen, n they'll probably do it,.. ttyl bro."

Based on your Affiant's training and experience, your Affiant is aware that incarcerated individuals frequently use coded messages or speak in code to hide illegal activity because they are aware that their conversations are being monitored and/or recorded. With this in mind, your Affiant believes that Plumer and Johnny Thomas previously had a deal for \$1,000 for every name/date of birth/social security number that Plumer could provide. Plumer then informed Johnny Thomas that he wanted a new deal as other individuals were able to promise anywhere between \$2,500 and \$5,000 per name/date of birth/social security. Johnny Thomas then relayed that multiple individuals were taking a cut of the payout and that he would try to rework the deal with these individuals.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding the PUA claims of: Kareem Harper'el, Dominique McKinney, Jermaine Plumer, Martez Windle, Franklin Johnson, Jayver Perry, James Taylor and Lawrence Jackson. Pennsylvania L&I records show that Plumer's application for PUA was submitted electronically on July 2, 2020 at 9:36pm. Your Affiant notes that Plumer was incarcerated on the date his application was submitted and would be ineligible for PUA. Furthermore, your Affiant notes that Plumer has no recorded work history through L&I and was not unemployed due to COVID-19, meaning that he would be ineligible to receive PUA.

The Pennsylvania Department of Labor and Industry provided PUA payment information, including the last 4 digits of the US Bank Debit Cards. These individuals, whose personal information was given out by Jermaine Plumer, received the following PUA payments:

TABLE #1

Name of Applicant and SSN	Payment Date/ Payment Amount	US Bank Debit Cards Used for Payments (Last 4 Digits)
Kareem Harper'el (a/k/a James Spencer) xxx-xx-2453	7/3/20 - \$1,890.00 7/9/20 - \$378.00 7/13/20 - \$378.00 7/20/20 - \$378.00 7/27/20 - \$378.00	9072
Dominique McKinney xxx-xx-6122	6/18/20 - \$2,430.00 6/25/20 - \$203.00 7/2/20 - \$203.00 7/6/20 - \$203.00 7/13/20 - \$203.00 7/20/20 - \$203.00 7/27/20 - \$203.00 8/3/20 - \$203.00 8/10/20 - \$203.00	9457
Jermaine Plumer xxx-xx-8734	7/3/20 - \$3,675.00 7/6/20 - \$175.00 7/13/20 - \$175.00 7/20/20 - \$175.00 7/27/20 - \$175.00 8/3/20 - \$175.00 8/10/20 - \$175.00	6952 6952
Martez Windle xxx-xx-2142	Unknown	5573
Franklin Johnson xxx-xx-7318	7/4/20 - \$94.00 7/10/20 - \$94.00 7/13/20 - \$94.00 8/10/20 - \$731.00	7037
Jayver Perry xxx-xx-9994	Unknown	0020
James Taylor xxx-xx-2775	7/21/20 - \$195.00 7/27/20 - \$195.00 8/3/20 - \$195.00 8/12/20 - \$195.00	4140
Lawrence Jackson xxx-xx-7982	7/8/20 - \$4,290.00	3157

Your Affiant conducted a review of Plumer's "JPay" account, which documents who deposits money in to the account of each inmate, when the payment was made, how the payment was made and what IP address was used to make each electronic payment. Plumer's "JPay" records date back to November 2010 and show that he normally received small dollar deposits. Prior to Plumer providing the personal information of the individuals referenced in Table 1, he only received two payments between November 2010 and June 2020 that exceed \$300. Between July 6, 2020 (the date of Plumer's last message containing other individual's personal information) and September 5, 2020, Plumer has had eight separate deposits of \$300 each to his "JPay" account. These deposits were made by Antonio Joyner (whom he gave personal information out to), Brian Qualls and Felice Qualls. Through his training and experience, your Affiant is aware that increases in frequency and dollar amount of deposits is often indicative of a kickback scheme.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of his knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant, Jermaine Plumer.

I, SA ROBERT MCHUGH #516, 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.

Det. J. H.
Special Agent

Sworn to me and subscribed this 21 day of September
9/21/20 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 12-3-04
MDJ Name: Hon. DOMINIC PELINO
Address: 576 EAST MAIN STREET
HUMMELSTOWN, PA
17036
Telephone: (717) 583-1912

DEFENDANT: (NAME and ADDRESS):
RAFAEL A RODRIGUEZ
First Name Middle Name Last Name Gen.
SCI PHOENIX
1200 MOKYCHIC ROAD
COLLEGEVILLE, PA 19426

NCIC EXTRADITION CODE TYPE

☒ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States Distance:
☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending
☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CK-24320 Date Filed: 09/22/20 OTN/LiveScan Number: U915901-0 Complaint/Incident Number: OCE-20-0053 Request Lab Services? ☐ YES ☒ NO
GENDER: ☒ Male ☐ Female DOB: 10/07/1989 POB: Add'l DOB: Co-Defendant(s) ☐
AKA First Name: Middle Name: Last Name: Gen.
RACE: ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown
ETHNICITY: ☒ Hispanic ☐ Non-Hispanic ☐ Unknown
HAIR COLOR: ☐ GRY (Gray) ☐ RED (Red / Auburn) ☐ 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: UNKNOWN
FBI Number: MNU Number: FL HEIGHT In.
Defendant Fingerprinted: ☐ YES ☒ NO 6 1
Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

Plate # State Hazmat Registration Sticker (MM/YY) Comm'l Veh. Ind. School Veh. Oth. NCIC Veh. Code Reg. same as Def.
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. Pa.R.Crim.P. 507.)

SDAG HEATHER CASTELLINO
(Name of Attorney for Commonwealth - Please Print or Type)

Approved via Phone
(Signature of Attorney for Commonwealth)

09/22/2020
(Date)

I, SPECIAL AGENT ROBERT MCHUGH
(Name of Affiant - Please Print or Type)

#516
(PSP/MP/OCETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania Office of Attorney General and Pennsylvania State Police.
(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 is 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 PA DEPARTMENT OF LABOR & INDUSTRY, 651
(Subdivision Code) BOAS STREET, HARRISBURG, PA 17121
(Place/Political Subdivision)

in DAUPHIN County

22
(County Code)

on or about JUNE 12, 2020 TO AUGUST 24, 2020
(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CC-20-0053	Date Filed: 09/22/20	OTN/LiveScan Number U915901-0	Complaint/Incident Number OCE-20-0053
Defendant Name	First: RAFAEL	Middle: A	Last: RODRIGUEZ

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: 0
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<input checked="" type="checkbox"/> Lead?	1	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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):

THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant unlawfully took or exercised unlawful control over movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. TO WIT: During the COVID-19 pandemic, Rafael A. RODRIGUEZ, and others on his behalf, falsley filed applications for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website even though RODRIGUEZ and the other applicants did not qualify for those funds.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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):

CRIMINAL CONSPIRACY - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, during the time frame above, within the County of Dauphin, Montgomery and Berks, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903..



POLICE CRIMINAL COMPLAINT

Pocket Number: CR24320	Date Filed: 08/22/20	OTN/LiveScan Number: A 915401-2	Complaint/Incident Number: OCE-20-0053
Defendant Name	First: RAFAEL	Middle:	Last: RODRIGUEZ

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	Offense # 3	Section 7512	Subsection (a)	PA Statute (Title) of the Title 18, PA Crimes Code	Counts 3	Grade F3	NCIC Offense Code	UCR/NIBRS Code
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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):
CRIMINAL USE OF A COMMUNICATION FACILITY

Acts of the accused associated with this Offense:

In that the Defendant, 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 or under the act of April 14, 1972 (P.L.233, No.64), known as the Controll Substance Drug, Device and Cosmetic Act. TO WIT: On separate occasions, Rafael A. RODRIGUEZ and others utilized electronic communications through the Department of Corrections SCI Phoenix electronic messaging system to send names, dates of birth and social security numbers to be used to submit fraudulent Pandemic Unemployment Assistance applications on the PA Department of Labor and Industry Website.

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: 0
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<input type="checkbox"/> Lead?	Offense # 4	Section 3922	Subsection (a)(3)	PA Statute (Title) of the Title 18, PA Crimes Code	Counts 1	Grade F3	NCIC Offense Code	UCR/NIBRS Code
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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):
THEFT BY DECEPTION

Acts of the accused associated with this Offense:

In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Rafael A. RODRIGUEZ and others falsely filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for RODRIGUEZ and others even though RODRIGUEZ and the other applicants did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct. The PA Department of Labor and Industry sent a total of \$22,109.00 of PUA funds based off of the information provided by Rodriguez to his co-conspirator(s).



POLICE CRIMINAL COMPLAINT

Docket Number: C24320	Date Filed: 09/22/20	OTN/LiveScan Number U915901-0	Complaint/Incident Number OCE-20-0053
Defendant Name	First: RAFAEL	Middle: A	Last: RODRIGUEZ

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	3922	(a)(3)	of the	Title 18, PA Crimes Code	1	F3		
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):

CRIMINAL CONSPIRACY – THEFT BY DECEPTION

Acts of the accused associated with this Offense:

In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Rafael A. RODRIGUEZ and others falsely filed an application for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for RODRIGUEZ even though he did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct. The PA Department of Labor and Industry sent a total of \$22,109.00 of PUA funds based off of the information provided by Rodriguez to his co-conspirator(s).

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: 0
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<input type="checkbox"/> Lead?				of the					
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):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CG-24380</u>	Date Filed: 09/22/20	OTN/LiveScan Number <u>U91594-0</u>	Complaint/Incident Number OCE-20-0053
Defendant Name	First: RAFAEL	Middle: A	Last: RODRIGUEZ

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. §4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 3
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently 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.)

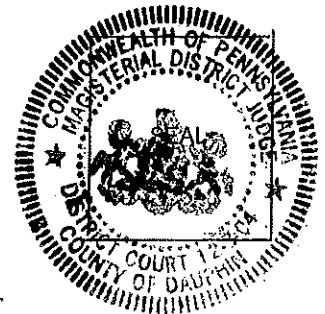
SEPTEMBER 22, 2020
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date, 9/21/2020 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.

12304
(Magisterial District Court Number)

[Signature]
(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA

v.

Rafael A. Rodriguez

AFFIDAVIT OF PROBABLE CAUSE

Your Affiant, Special Agent Robert McHugh, Office of Attorney General, Bureau of Criminal Investigations being duly sworn, deposes and says:

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the **Pandemic Unemployment Assistance (PUA)** program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: **"Inmates;** Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; **Individuals being**

paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution."

On June 1, 2020, the OAG received a referral letter from the Governor's Office requesting that this agency investigate instances of PUA fraud.

FINDINGS OF FACT

Rafael Rogriguez was convicted of "Persons not to Possess, Use, etc Firearms" on June 20, 2018 and sentenced to three to six years in prison. Rodriguez is currently incarcerated at State Correctional Institution – Phoenix, located at 1200 Mokychic Road, Collegeville, PA 19426. Rodriguez has remained in custody since June 22, 2018 and has no record of employment according to PA Department of Labor and Industry (L&I) records.

While incarcerated at SCI Phoenix, Rodriguez has the ability to communicate with individuals outside of prison using the telephone, U.S. Mail or electronic messages through a GTL tablet. All of these methods of communication are monitored by PA Department of Corrections staff. Rodriguez has had multiple messages "flagged" by PA Department of Corrections staff related to potential PUA fraud.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding the PUA

claim of Rafael A. Rodriguez. Pennsylvania L&I records show that the PUA application for Rodriguez was submitted electronically on June 12, 2020 by an IP address outside of a PA Department of Corrections facility. Your Affiant notes that Rodriguez was incarcerated on this date, thus making him ineligible to receive PUA. Furthermore, Your Affiant notes that Rodriguez was not unemployed due to COVID-19, which also means that he would be ineligible to receive PUA.

On July 6, 2020 at 7:19am, Rodriguez sent an electronic message through his GTL tablet to an individual identified as Anthony Torres: "Yo bro new client ...Name=Daniel E. Lewis DOB5-16-82- SS#xxx-xx-1698' idk if u need this jaw but his moms name is gloria lewis... But bro all we gotta give them is 5 everything else is us bro ...let me know wassup."

On July 6, 2020 at 7:27am, Rodriguez again sent an electronic message through his GTL tablet to Anthony Torres which read: Yo bro i got another jawn ..jorge o. Velasquez ...dob.9-4-79""\$\$#xxx-xx-7543"" and this is another jawn Calvin Adams" dob"5-12-75""\$\$#xxx-xx-3715."

On July 15, 2020 at 9:42am, Rodriguez sent a third message to Anthony Torres which read: Wassup bro „wat u up too im so mad that ur borrowing \$\$u should b up smfh but i just hope u get on it...i got this jawn its for 3 of us bro ...!!!!@Dennis#John#Velez #0xxx#xx#0861=8#3#83#...but i hope ur good my nigga i love and miss u bro ...hit me back asap."

Furthermore, Rodriguez talks to Torres about a sending \$1000 and \$1500 through Cash App to a user named "Stillmatic100." On July 3, 2020 at 6:14PM, Rodriguez sends the following message to Torres: "Yo bro how much we got all together on the app? I need u to send \$1000 to stillmatic tonight or by tomorrow by 12am so i can keep our \$\$ coming in bro u digg me ...please bro i need u to do it asap bro i am really serious when i say that i appriciate everything u been

doing for me bro u def earned my respect bro but we gonna keep getting \$ just keep doing what u doing ..i love u bro dont let me down bro ...i need that done asap bro ...i love u ttil c u 2morrow."

Based on his training and experience, SA is aware that Cash App is used in fraud schemes as a way to send electronic payments with ease and with relative anonymity. Furthermore, Rodriguez is describing a financial relationship between himself, Torres and "Stillmatic." Rodriguez states that if Torres does not transfer money to "Stillmatic," they will be cut off from any future arrangements.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding the PUA claims of: Daniel Lewis, Jorge Velasquez, Calvin Adams and Dennis Velez. The Pennsylvania Department of Labor and Industry provided PUA payment information, including the last 4 digits of the US Bank Debit Cards. These individuals, whose personal information was given out by Rafael Rodriguez, received the following PUA payments:

Name of Applicant and SSN	Payment Date/ Payment Amount	US Bank Debit Cards Used for Payments (Last 4 Digits)
Rafael Rodriguez xxx-xx-4289	6/13/20 - \$2,145.00 6/17/20 - \$195.00 6/24/20 - \$195.00	7484
Daniel Lewis xxx-xx-1698	7/4/20 - \$3,315.00	Unknown
Jorge Velasquez xxx-xx-7543	7/2/20 - \$3,315.00 7/7/20 - \$195.00 7/17/20 - \$195.00 7/23/20 - \$195.00 7/29/20 - \$195.00 8/3/20 - \$195.00 8/10/20 - \$195.00	8353 and 4127
Calvin Adams xxx-xx-3715	7/15/20 - \$10,994.00	2726
Dennis Velez xxx-xx-0861	8/14/20 - \$390.00 8/17/20 - \$195.00 8/24/20 - \$195.00	Unknown

Your Affiant conducted a search of PA Department of Corrections records and determined that Lewis, Velasquez and Adams were all incarcerated while their names and personal information were used to apply for PUA. Furthermore, Lewis, Velasquez and Adams have no work history according to PA Labor and Industry records meaning that they would not be qualified to receive PUA.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of his knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant, Rafael A. Rodriguez.

I, SA ROBERT MCHUGH #516, 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.

Robert M. Hugh
Special Agent

Sworn to me and subscribed this 21 day of September
9/21/20 Date *DM*, Magisterial District Judge

My commission expires first Monday of January, _____



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
MDJ: Hon. Dominic A. Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

RONALD

E

BAKER

First Name

Middle Name

Last Name

SCI Benner Township, 301 Institution Drive,
Bellefonte, PA 16823

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <u>CR-248-20</u>	Date Filed <u>9/22/20</u>	OTN/LiveScan Number <u>0915951</u>	Complaint/Incident Number <u>OCC-20-0020</u>	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <u>10/17/1968</u>	POB <u>Indiana</u>	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 checked="" 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 type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input checked="" 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"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) <u>200</u>		
FBI Number	MNU Number	Ft. HEIGHT In. <u>5</u> <u>10</u>		
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:			

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because:

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

HEATHER A. CASTELLINO, SDAG
(Name of the attorney for the Commonwealth)

APPROVED VIA PHONE
(Signature of the attorney for the Commonwealth)

09/22/2020
(Date)

I, SPECIAL AGENT CHRISTOPHER WEAVER
(Name of the Affiant)

BADGE #603

(PSP/MP/OTC -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 [301] PA Dept Of Labor And Industry,
651 Boas St, Harrisburg, Pa (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MARCH 12, 2020 TO AUGUST 31, 2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	3921	a	of the	TITLE 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	

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

Acts of the accused associated with this Offense: The Defendant did, take or exercise unlawful control over movable property of another, with the intent to deprive him thereof. The Defendant also committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	3921	a	of the	TITLE 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	

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

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Unlawful Taking or Disposition, Title 18, Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. 6903.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	3922	a 3	of the	TITLE 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): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant did intentionally obtains or withhold property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	4	3922	a 3	of the	TITLE 18	1	F3		
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): **CRIMINAL CONSPIRACY**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Deception, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crimes of theft by deception in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?				of the					
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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):

Acts of the accused associated with this Offense: RECEIVING STOLEN PROPERTY: (F3) 18 Pa.C.S. §3925(a)
The Defendant did, intentionally receive, retain or dispose of movable property of another knowing that it had been stolen or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?				of the					
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>02-248-20</u>	Date Filed: <u>9/21/20</u>	OTN/LiveScan Number <u>U915951-1</u>	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

- 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 20.
- 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.

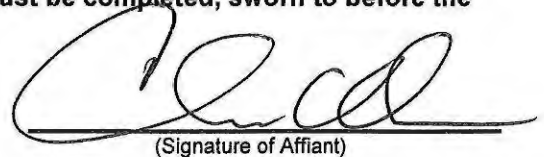
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

SEPTEMBER 22

2020

(Date)

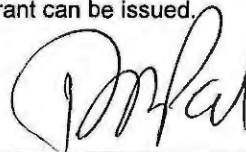
(Year)

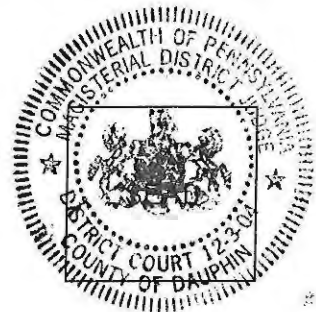

(Signature of Affiant)

AND NOW, on this date 9/21/2020 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.

12-3-04
(Magisterial District Court Number)


(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

AFFIDAVIT of PROBABLE CAUSE

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords. Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

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The Pennsylvania Department of Labor and Industry reported that Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all applied for PUA in March of 2020 and all except Neff Zonge received PUA benefit payments. Based upon their dates of incarceration none of the inmates would have been eligible for PUA benefit payments.

Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig are all currently inmates at the State Correctional Institution Benner located in Benner Township in Centre County, PA. Department of Corrections information indicated that Todd A. Butler has been incarcerated from 2000 to present, Jacob P. Snook has been incarcerated from 2016 to present, James E. Sullivan has been incarcerated from 2016 to present, Derek L. Young has been incarcerated from 2019 to present, Ronald E. Baker has been incarcerated since 2013 to present, James G. Neff Zonge has been incarcerated since 2019 to present, Michael C. Lyter has been incarcerated since 2009 to present, James M. Leidig has been incarcerated since 2017 to present, and Joseph E. Klecha has been incarcerated since 2012 to present.

Pennsylvania Department of Labor and Industry records showed that all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig had their applications filed from the same IP address 71.207.11.46. Your Affiant conducted a search and determined that IP address 71.207.11.46 is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Jacob P. Snook's claim. Pennsylvania Department of Labor and Industry records show that Snook's application for PUA was submitted on June 12, 2020. On the

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application it was reported that Snook's last day of employment was 3/13/2020. Your Affiant notes that Snook was incarcerated on the date his application was submitted. Additionally, records show that Snook's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Snook. Records show that Snook received payments on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$10,125.00. The payments were from the last day of work listed on Snook's application to present. These payments directly coincide with the time that Snook was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 6072. This card was sent to 1731 Blue Course Drive, PA. Phone number 814-826-8555 was used on the application as Snook's phone number. As a part of this investigation, your Affiant conducted a property records search and determined that Donald Moore and Adele Moore live at this address. Snook is from Centre County and his girlfriend is Adele Moore.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James E. Sullivan's claim. Pennsylvania Department of Labor and Industry records show that Sullivan's application for PUA was submitted on June 16, 2020. On the application it was reported that Sullivan's last day of employment was 3/18/2020. Your Affiant notes that Sullivan was incarcerated on the date his application was submitted. Additionally, records show that Sullivan's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Sullivan. Records show that Sullivan received payments on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Sullivan's application to present. These payments directly coincide with the time that Sullivan was incarcerated at SCI Benner. The PUA

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payments were made using a US Bank pre-paid debit card with the last four numbers 6664. This card was sent to 138 High Blue Ave, Hawley, PA in Wayne County. As a part of this investigation, your Affiant conducted a property records search and determined that Julia Sullivan lives at this address. Records check indicated that Young is from the Wayne County area and that his mother is Julia Sullivan.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Todd A. Butler's claim. Pennsylvania Department of Labor and Industry records show that Butler's application for PUA was submitted on June 17, 2020. On the application it was reported that Butler's last day of employment was 3/18/2020. Your Affiant notes that Butler was incarcerated on the date his application was submitted. Additionally, records show that Butler's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Butler. Records show that Butler received payments on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Butler's application to present. These payments directly coincide with the time that Butler was incarcerated at SCI Benner. The PUA payments were made by check and using a US Bank pre-paid debit card with the last four numbers 7797. This card was sent to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. As a part of this investigation, your Affiant conducted a property records search and determined that James Zonge lives at this address and the property was recently listed for sale. Todd Butler has never lived in Centre County and prior to his incarceration he resided in the Ohio and Pittsburgh areas. James Zonge is the father of James Neff Zonge who is currently incarcerated at SCI Benner.

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The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Derek L. Young's claim. Pennsylvania Department of Labor and Industry records show that Young's application for PUA was submitted on June 12, 2020. On the application it was reported that Young's last day of employment was 3/18/2020. Your Affiant notes that Young was incarcerated on the date his application was submitted. Additionally, records show that Young's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Young. Records show that Young received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Young's application to present. These payments directly coincide with the time that Young was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 0093. This card was sent to 574 Lehman Drive, Watontown, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Larry and Stephanie Young live at this address. Young is from the Watontown, PA area and his mother is Stephanie Young.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Ronald E. Baker's claim. Pennsylvania Department of Labor and Industry records show that Baker's application for PUA was submitted on June 30, 2020. On the application it was reported that Baker's last day of employment was 3/18/2020. Your Affiant notes that Baker was incarcerated on the date his application was submitted. Additionally, records show that Baker's application was submitted by an individual using IP Address IP address 71.207.11.46.

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The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Baker. Records show that Baker received payments on 7/1/20, 7/9/20, 7/15/20, and 7/21/20. The total for all the payments was \$13,110.00. The payments were from the last day of work listed on Baker's application to present. These payments directly coincide with the time that Baker was incarcerated at SCI Benner. The PUA payments were made by checks sent to 44 Glen Ave, Glenrock, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Rose M. Yetter resides at this address. Records search shows that Baker is from Glenrock, PA and his mother is Rose M. Yetter.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Michael C. Lyter's claim. Pennsylvania Department of Labor and Industry records show that Lyter's application for PUA was submitted on June 25, 2020. On the application it was reported that Lyter's last day of employment was 3/18/2020. Your Affiant notes that Lyter was incarcerated on the date his application was submitted. Additionally, records show that Lyter's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Lyter. Records show that Lyter received payments on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Lyter's application to present. These payments directly coincide with the time that Lyter was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 0490. This card was sent to 96 Peach Road, Liverpool, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Savannah Lyter lives at this address. Savannah Lyter is the wife of Michael C. Lyter.

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The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Joseph E. Klecha's claim. Pennsylvania Department of Labor and Industry records show that Klecha's application for PUA was submitted on June 27, 2020. On the application it was reported that Klecha's last day of employment was 3/18/2020. Your Affiant notes that Klecha was incarcerated on the date his application was submitted. Additionally, records show that Klecha's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Klecha. Records show that Klecha received payments on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Klecha's application to present. These payments directly coincide with the time that Klecha was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 2915. This card was sent to 322 Charles Rd, Montrose, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Joanne (Klecha) Hogan lives at this address. Joanne (Klecha) Hogan is the mother of Joseph E. Klecha.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James M Leidig's claim. Pennsylvania Department of Labor and Industry records show that Leidig's application for PUA was submitted on June 22, 2020. On the application it was reported that Leidig's last day of employment was 3/18/2020. Your Affiant notes that Leidig was incarcerated on the date his application was submitted. Additionally, records show that Leidig's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Leidig. Records show that Leidig received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the



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payments was \$22,245.00. The payments were from the last day of work listed on Leidig's application to present. These payments directly coincide with the time that Leidig was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 4556. This card was sent to 6659 Nunnery Rd, Waynesboro, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Serena Snyder lives at this address. Serena Snyder is the girlfriend of James M. Leidig.

All SCI Benner inmates Snook, Sullivan, Butler, Young, Baker, Neff Zonge, Lyter, Klecha, and Leidig had their applications submitted by IP address 71.207.11.46 which is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054 in the same week in June of 2020. All inmates were incarcerated for the entire 2020 year but all listed on their applications their last day of work as March of 2020.

Your Affiant was able to identify the phone number 814-826-8555 that was used to submit the first application for inmate Jacob Snook. Checks online and with the State College Police Department determined that the phone number belonged to an Adele B. Moore who resides at 1731 Blue Course Drive, State College, PA. Adele Moore's address was also the address used on Jacob Snook's application and where the US Bank Debit card was mailed. State College Police also reported that based upon prior incidents they believed that Snook and Moore were boyfriend and girlfriend.

On 8/13/20 your Affiant went to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. Your Affiant interviewed the home owner James Zonge. Zonge stated that he had received a letter from the unemployment office for a Todd Butler. Zonge stated his son James Neff-Zonge is in SCI Benner and had asked him to allow a friend Todd Butler to use his address. Zonge stated that his son told him that his friend had just gotten out of jail and needed help getting back on his feet. Zonge reported that when the letter came his son Neff-Zonge advised him to call a female friend and she would come pick the letter up. Zonge stated that the girl was a friend of his sons and provided the name Adele Moore and gave her phone number as 814-826-8555. Zonge stated that he had made arrangements



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for Adele Moore to pick up the letter for Todd Butler though his sister due to him being out of town. Zonge stated that to his knowledge Adele Moore received the letter from his sister.

On 8/14/20 your Affiant located and interviewed Adele B. Moore at the State College Police Department. Moore was advised of the investigation and the information that had been obtained from all the involved agencies. Adele Moore who was visibly upset admitted that she is inmate Jacob Snook's girlfriend and admitted that she had submitted the PUA Applications for the inmates involved. Moore stated that she first got the idea from Jacob Snook when he was in SCI Huntingdon. Moore stated that Snook told her to file the application and then he got transferred to SCI Benner. Moore stated that on 6/12/20 she submitted the PUA application online for Jacob Snook. Moore stated that she is also friends with and talks with SCI Benner inmate James Neff Zonge whom she knew from them both living in Centre County, PA. Moore reported that during conversations with Neff Zonge she told him what she did for Snook regarding the unemployment application and Neff Zonge asked her to fill out an application for him. Moore stated that she tried to fill out the PUA application for Neff Zonge but could not complete the application with Neff Zonge's social security number. Moore stated that she then told Neff Zonge that his application did not work and he then gave her name and information on other inmates to submit applications. Moore stated that she then submitted applications for SCI Benner inmates James Sullivan, Todd Butler, Derek Davis, Ronald Baker, and other inmates. Moore indicated that not all applications she submitted worked. Moore stated that she submitted all the applications from her residence. Moore stated that the residence belongs to her father Donald Moore and that the internet provider that her father uses is Comcast Cable. Moore stated that she received or obtained the debit cards for Jacob Snook and Todd Butler. Moore stated that inmate Butler is not from Pennsylvania and did not have anyone to help him on the outside or a PA address. Moore stated that they used James Neff-Zonge's father and his father's address for Todd Butler's application. Moore stated that the other debit cards were sent to the inmate's families or friends and then the family member or friend activated and used the debit cards. Moore stated that the arrangement

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was that Moore would receive \$500 from the inmate's family member or friend for her filling out the applications. Moore used the debit cards in Jacob Snook and Todd Butler to put money in Snook, Butler, and Neff Zonge's JPay accounts using her name and a fake name of Christina Fisher. Moore stated that she also withdrew money on a daily basis and spent some of it on miscellaneous items for herself. Moore was asked where the remaining approximately \$7000.00 was spent and she stated that she paid her bills, paid her probation fines and costs, gave James Neff-Zonge's mother Linda Neff cash, and a large portion of the money was used by her at a medical marijuana dispensary in State College. Moore was asked where the debit cards for Snook and Butler were currently located and she pulled the debit cards for Snook and Butler out of her wallet. Moore turned the cards over to your Affiant. Moore stated that she was unsure if the cards had any remaining balances on them. Moore stated that she did receive \$500 from a family member of inmate Derek Young through a mobile app called "Cash App". Moore stated that she receive \$500 from a family member of inmate James Sullivan through the mobile app "Cash App". Moore stated that she also received \$500 from a family member of inmate Ronald Baker through a check in the mail because the person reportedly Baker's elderly mother did not have access to the mobile app. Moore stated that she knew that the filing for the PUA money was illegal and expressed concern over going to jail and others being arrested.

Affiant reviewed prison phone calls from June, July, august between Adele Moore and inmate James Neff Zonge and inmate Jacob Snook. Moore talks extensively about filing for the PUA money and discussing how to avoid being caught and concern over being charged criminally if caught. Moore made and received multiple calls and messages from inmates to assist in the filing of the applications and the distributions of the funds to herself and involved inmates. On July 16, 2020 Adele Moore had a conversation by phone with Jacob Snook. During the phone call Moore tells Snook that James Neff Zonge provides her with the inmate name and she then fills out the application. Moore states that she sends the money to the inmates "people" and when they receive the money the send \$2000.00 by Cash App to Neff Zonge's mother. Moore states that Neff Zonge's mother then gives her \$1000.00.



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Affiant also reviewed Department of Labor and Industry records and determined that Adele Moore had filed for numerous inmates and had filed PUA applications for more inmates that she had admitted to during her interview on 8/14/20.

On 8/20/20 Affiant spoke with Linda Neff the mother of inmate James Neff Zonge. Linda Neff who lives at 1850 North Oak Lane, State College, PA 16803 stated that she did receive money from Adele Moore and place the money on her sons prison account. Linda Neff stated that she believed that the money was from friend and did not know it was illegally obtained money from unemployment.

The Pennsylvania Department of Labor and Industry also provided information that James Neff Zonge was issued a US Bank pre-paid debit card with the last four digits 1282 and that the card was sent to Neff Zonge's mother's address at 1850 North Oak Lane, State College, PA 16803. Neff Zonge was issued a US Bank debit cards but no funds were deposited in the account.

On 8/21/20 Affiant spoke with Stephanie Young the mother of inmate Derek Young. Stephanie Young was in possession of the US Bank debit card and turned over the card you your Affiant. Stephanie Young was also in possession of \$2000.00 cash that she had withdrawn and placed in a safe in her home. Young stated that her son had instructed her what to do with the debit card from prison and told her that it was old unemployment related to a settlement which was owed to him. Young stated that she withdrew money from the card and placed money on her sons prison account. Young stated that she was suspicious because she was also instructed to send money to Adele Moore and Linda Neff for them filling out the paperwork for the money. Young provided screenshots of Cash App transaction from her phone from July 1, 2020 and July 2, 2020 where she sent Linda Neff a total of \$2000.00 (two \$1000.00 payments). Young also provided a screenshot of a Cash App transaction from July 27, 2020 where she sent Adele Moore \$500.00. Young stated that she was instructed by her son Derek Young to pay Linda Neff and Adele Moore for their help with obtaining the money.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

Your Affiant obtained the SCI Benner inmate money account information "JPay" for all the inmates involved. All the inmates involved Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all had payments placed on their JPay accounts on or around the time of each of the PUA payments that were deposited on the US Bank pre-paid debit card for the inmates.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Jacob P. Snook debit card on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Snook received money on his account from Adele Moore on 6/25/20, 6/29/20, 7/2/20, 7/5/20, 7/9/20, 7/12/20, 7/13/20, 7/17/20, 7/23/20, and 7/27/20. The total amount deposited on Jacob Snook's JPay account by Adele Moore was \$3150.00.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Todd A. Butler's debit card on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Butler received money on his account from Christina Fisher an alias used by Adele Moore on 6/28/20, 7/1/20, 7/5/20, 7/9/20, 7/13/20, 7/17/20, 7/25/20, 7/29/20, and 8/10/20. The total amount deposited on Todd Butler's JPay account by Adele Moore was \$2000.00.

The SCI Benner inmate money account JPay showed that James Neff Zonge received money on his account from Linda Neff on 6/22/20, 6/26/20, 6/30/20, 7/4/20, 7/8/20, 7/9/20, 7/12/20, 7/15/20, 7/19/20, 7/23/20, 7/27/20, 7/29/20, and 7/30/20. The total amount deposited on Neff Zonge's JPay account by Linda Neff was \$3150.00. Linda Neff is the mother of inmate James Neff Zonge and her address is 1850 N. Oak Lane, State College, PA.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Derek L. Young's debit card on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

that Young received money on his account from Stephanie L. Young on 6/23/20, 6/26/20, 7/4/20, 7/11/20, 7/18/20, 7/25/20, 7/28/20, 8/1/20, 8/7/20, and 8/9/20. The total amount deposited on Derek Young's JPay account by Stephanie L. Young was \$970.00. Records check indicated that Stephanie L. Young is the name of inmate Derek Young' mother and her address is 574 Lehman Drive, Watsonstown, PA. This is the same address used on Young's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James E. Sullivan's debit card on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Sullivan received money on his account from Julia Sullivan on 6/17/20, 7/7/20, 7/10/20, 7/26/20, and 8/7/20. The total amount deposited on James Sullivan's JPay account by Julia Sullivan was \$700.00. Records check indicated that Julia Sullivan is the name of inmate James Sullivan's mother and her address is 138 High Blue Ave, Hawley, PA. This is the same address used on Sullivan's PUA application and where his US Bank debit card was mailed. Contacted was made with Julia Sullivan and she was in possession of the US Bank Debit card in James Sullivan's name and was also in possession of \$9000 that she had withdrawn at her son's request using the debit card.

The Pennsylvania Department of Labor and Industry records show that PUA payment checks were sent to Ronald E. Baker on 7/1/20, 7/9/20, 7/15/20 and 7/21/20. The SCI Benner inmate money account JPay showed that Baker received money on his account from Rose M. Yetter on 7/17/20, 7/25/20, 7/31/20, and 8/10/20. The total amount deposited on Ronald Baker's JPay account by Rose M. Yetter was \$1000.00. Records check indicated that Rose M. Yetter is the name of inmate Ronald Baker's mother and her address is 44 Glen Ave, Glenrock, PA. This is the same address used on Baker's PUA application and where his checks were mailed.

On 8/20/20 Affiant spoke with Rose M. Yetter. Rose Yetter is the elderly mother of inmate Ronald Baker and owns the house at 44 Glen Ave, Glenrock, PA. Yetter stated that her son had lived at the address and she owns the property.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

Yetter was asked if she had been receiving unemployment money for her son Ronald. Yetter stated that her son Ronald called her from prison and told her that he would be getting unemployment and when she received money she was to put money on his account and use some of the money to help pay her bills. Yetter reported that she gets checks sent to her and she then puts money on her sons account. Yetter stated that she does not know who sends her the money. Yetter stated that she had also sent a personal check to a girl for helping her son get his unemployment but she could not recall the girl's name.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Michael C. Lyter's debit card on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter 8/2/20 and 8/16/20. The total amount deposited on Derek Young's JPay account by Savanna Lyter was \$3000.00. Records check indicated that Savanna Lyter is the name of inmate Michael Lyter's wife and her address is 96 Peach Rd, Liverpool, PA. This is the same address used on Lyter's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Joseph E. Klecha's debit card on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Klecha received money on his account from Joanne Klecha 7/7/20, 7/18/20, 8/9/20, 8/15/20, 8/24/20 and 8/26/20. The total amount deposited on Joseph Klecha's JPay account by Joanne Klecha was \$370.00. Records check indicated that Joanne Lyter is the name of inmate Joseph Klecha's mother and her address is 322 Charles Rd, Montrose, PA. This is the same address used on Klecha's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James M. Leidig's debit card on 6/23/20, 7/3/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter (Michael Lyter's wife) on 7/7/20, Christina B. Fisher (Adele

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

Moore) on 7/17/20, and from Stephanie Young (Derek Young's mother) on 7/4/20, 7/25/20, 8/1/20, 8/9/20, 8/16/20, 8/23/20, 8/30/20. The total amount deposited on James Leidig's JPay account was \$465.00.

On 9/2/20 your Affiant interviewed all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig at SCI Benner.

Jacob P. Snook, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig admitted to their involvement in receiving the unemployment money. Inmate Todd Butler made no statements. James Neff Zonge stated that Adele Moore asked him if he wanted to apply for the unemployment and he agreed and then provided her with other inmate's names for her to fill out applications.

Affiant reviewed prison phone calls and messages between Adele Moore and Jacob Snook and Adele Moore and James Neff Zonge. Affiant confirmed through the messages that Adele Moore first applied for PUA for herself and Snook then spoke with Neff Zonge and he provided her with his information the additional inmate names and information. Neff Zonge provided the inmate information and discussed filing the application and how the money would be shared and dispersed over the phone with Adele Moore.



POLICE CRIMINAL COMPLAINT

Docket Number: CL-208-20	Date Filed: 9/21/20	OTN/LiveScan Number: U915951-1	Complaint/Incident Number: OCC-20-0020
Defendant Name:	First: RONALD	Middle: E	Last: BAKER

I, SPECIAL AGENT CHRISTOPHER WEAVER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

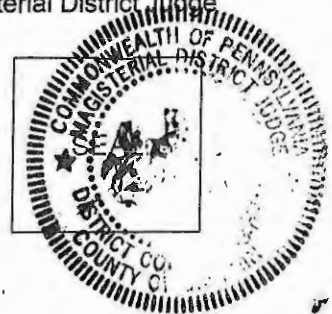
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

(Signature of Affiant)

Sworn to me and subscribed before me this 21 day of September 2020
9/21/20 Date

, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-3-04
 MDJ Name: Hon. DOMINIC PELINO
 Address: 576 EAST MAIN STREET
 HUMMELSTOWN, PA 17036
 Telephone: (717) 583-1912



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
ANDREW LASHAWN SIMMS
 First Name Middle Name Last Name Gen.
 SCI PHOENIX
 1200 MOKYCHIC ROAD
 COLLEGEVILLE, PA 19426

NCIC EXTRADITION CODE TYPE

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 5-Felony Pend.	<input type="checkbox"/> C-Misdemeanor Surrounding States	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: CR245-20 Date Filed: 09/22/20 OTN/LiveScan Number: 0915419-4 Complaint/Incident Number: OCE-20-0030-3 Request Lab Services? ☐ YES ☒ NO

GENDER ☒ Male ☐ Female **DOB** 03/19/1996 **POB** **Add'l DOB** **Co-Defendant(s)** ☐
AKA **First Name:** **Middle Name:** **Last Name:** **Gen.**

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

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR ☐ GRN (Green) ☐ RED (Red / Auburn) ☐ 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.)** UNKNOWN

FBI Number **MNU Number** **Ft. HEIGHT In.**

Defendant Fingerprinted ☐ YES ☒ NO **5** **10**

Fingerprint Classification:

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. Pa.R.Crim.P. 507.)

SDAG HEATHER CASTELLINO
 (Name of Attorney for Commonwealth - Please Print or Type)

Approved via Phone
 (Signature of Attorney for Commonwealth)

09/22/2020
 (Date)

I, SPECIAL AGENT ROBERT MCHUGH
 (Name of Agent - Please Print or Type)

#516
 (PSP/AMPOETC - Assigned Agent ID Number & Badge #)

of the Pennsylvania Office of Attorney General and Pennsylvania State Police.
 (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 is 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** **PA DEPARTMENT OF LABOR & INDUSTRY, 651**
 (Subdivision Code) **BOAS STREET, HARRISBURG, PA 17121**
 (Place/Political Subdivision)

in **DAUPHIN** County

22
 (County Code)

on or about **JUNE 30, 2020 TO JULY 13, 2020**
 (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR2520	Date Filed: 09/22/20	QTN/LiveScan Number U 91599-4	Complaint/Incident Number OCE-20-0030-3
Defendant Name	First: ANDREW	Middle: LAWSHAWN	Last: SIMMS

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 checked="" 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: 0
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<input checked="" type="checkbox"/> Lead?	1	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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):
ATTEMPT - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant, with intent to commit theft by unlawful taking, committed an act or acts constituting a substantial step toward the commission of that crime, in that he unlawfully took or exercised unlawful control over movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. TO WIT: During the COVID-19 pandemic, Andrew SIMMS, and others on his behalf, falsely filed an application for the Pandemic Unemployment Assistance benefit program even though SIMMS did not qualify for those funds.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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):
CRIMINAL CONSPIRACY - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, during July of 2020, within the County of Dauphin, Montgomery and Delaware, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903..



POLICE CRIMINAL COMPLAINT

Pocket Number: CR 21520	Date Filed: 09/22/20	OTN/LiveScan Number U915919-4	Complaint/Incident Number OCE-20-0030-3
Defendant Name	First: ANDREW	Middle: LASHAWN	Last: SIMMS

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	7512	(a)	of the	Title 18, PA Crimes Code	1	F3		
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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):

CRIMINAL USE OF A COMMUNICATION FACILITY

Acts of the accused associated with this Offense:

In that the Defendant, 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 or under the act of April 14, 1972 (P.L.233, No.64), known as the Controll Substance Drug, Device and Cosmetic Act. TO WIT: Andrew SIMMS and others utilized electronic communications through the Department of Corrections SCI Phoenix electronic messaging system to send names, dates of birth and social security numbers to be used to submit fraudulent Pandemic Unemployment Assistance applications on the PA Department of Labor and Industry Website.

Inchoate Offense	<input checked="" 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: 0
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<input type="checkbox"/> Lead?	4	3922	(a)(3)	of the	Title 18, PA Crimes Code	1	M3		
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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):

ATTEMPT -THEFT BY DECEPTION

Acts of the accused associated with this Offense:

The Defendant, with intent to commit theft by deception, committed an act or acts constituting a substantial step toward the commission of that crime, in that he intentionally obtained or withheld property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Andrew SIMMS and others falsely filed an application for the Pandemic Unemployment Assistance benefit program even though SIMMS did not qualify for those funds. On each application, the applicant must certify the information they provided is true and correct.



POLICE CRIMINAL COMPLAINT

Docket Number: CR24520	Date Filed: 09/22/20	OTN/LiveScan Number U915919-4	Complaint/Incident Number OCE-20-0030-3
Defendant Name	First: ANDREW	Middle: LASHAWN	Last: SIMMS

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	3922	(a)(3)	of the	Title 18 , PA Crimes Code	1	M3		
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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):

CRIMINAL CONSPIRACY – THEFT BY DECEPTION

Acts of the accused associated with this Offense:

In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently perform the promise. TO WIT: Andrew SIMMS and others falsely filed an application for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for SIMMS even though he did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct.

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: 0
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<input type="checkbox"/> Lead?				of the					
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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):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR24520</u>	Date Filed: 09/22/20	OTN/LiveScan Number <u>U915919-4</u>	Complaint/Incident Number OCE-20-0030-3
Defendant Name	First: ANDREW	Middle: LASHAWN	Last: SIMMS

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 3
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently 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.)

SEPTEMBER 22, 2020

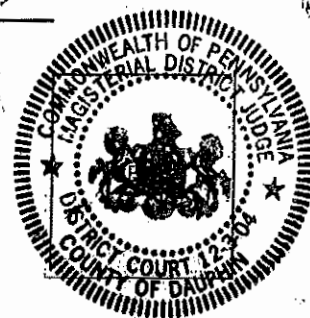
(Date)

(Signature of Affiant)

AND NOW, on this date, 9/21/2020 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.

12304
(Magisterial District Court Number)

(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA

v.

Andrew Lashawn Simms

AFFIDAVIT OF PROBABLE CAUSE

Your Affiant, Special Agent Robert McHugh, Office of Attorney General, Bureau of Criminal Investigations being duly sworn, deposes and says:

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the **Pandemic Unemployment Assistance (PUA)** program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: **"Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being**

paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution."

On June 1, 2020, the OAG received a referral letter from the Governor's Office requesting that this agency investigate instances of PUA fraud.

FINDINGS OF FACT

Andrew Simms was convicted of Murder on April 1, 2014 and sentenced to seven to fourteen years in prison. Simms is currently incarcerated at State Correctional Institution – Phoenix, located at 1200 Mokychie Road, Collegeville, PA 19426. Simms has remained in custody since April 11, 2014 and has no record of employment according to PA Department of Labor and Industry (L&I) records.

While incarcerated at SCI Phoenix, Simms has the ability to communicate with individuals outside of prison using the telephone, U.S. Mail or electronic messages through a GTL tablet. All of these methods of communication are monitored by PA Department of Corrections staff. Simms has had multiple messages "flagged" by PA Department of Corrections staff related to potential PUA fraud.

On June 30, 2020 at 1:15pm, Simms received an electronic message from an individual identified as Jezkae Jackson:

“Yoo D said he ain't get no pictures and he said wssp... and yoo tell ya folks to fill out that pua shit PANDEMIC UNEMPLOYMENT ASSISTANCE, I told BA sister about it... it ain't illegal, it's for everybody who dont have a job from March 3rd... that's how everybody coming up out this jawn.. everybody wearing designer and buying cars... I'm seeing all this on Fb And IG.... my lil brother just got 6k and getting 600 a week! bro I'm not making this shit up ! EVERYBODY DOING IT ! if they say you cant get it cause you in jail... is bull shit bro... dont let them tell you that STAMP... and btw that job, I needed my ssc for it , i walked all the way to arimingo ave to the ss office just to see that them bitches closed... smfh -_- this my number bro 267368183.”

On July 2, 2020 at 6:15pm, Simms received another electronic message from Jackson:

“Yoo bro that's all niggas doing out there... clothes and hoes... smfh... no cars apartments nothing.. that wont be me lol... I'm bout to buy a wheel.. and they got these apt for 400 a month and 200 deposit... and you need ya SSN DOB FIRST LAST MIDDLE ... address you want ya card to go to cause they wont do direct deposit... email phone number... I'm trynna put niggas on in the jails.. bro dont let nobody tell you , you cant get it cause you in there bro.. all they look for is work history.. once you put ya ssn in they pull all that up... I ran out of links and I called them 2 numbers you gave me and told them to pass a message 2 you for me, and nigga call me , if I dont answer double clutch bro STAMP BRO I LOOKED THIS SHIT UP TRUST ME! And it ain't fruad it's for people who dont have a job... Its only fruad if you try to get both unemployments....”

Simms responds to Jackson on July 3, 2020 at 7:14am and sends an electronic message which stated "I got my folks on top of the pua shit."

On July 10, 2020 at 5:19pm, Simms receives an electronic message from Jackson which says: "yoo spread the word in that jawn... tell everybody I can get them 7 - 9k back depends on they work history ! tell them I can get them the most money back ! try and get me like 5 people !"

On July 12, 2020 at 6:08pm, Simms sends an electronic message to Jackson: "so my mans phone died I guess but if my folks ain't put in the app for me already fill it out for me and send mines to 9 Fithian Drive New Castle De 19720. xxx-xx-five five eight zero and ima make sure byrd do that for you is his shit Reginald Timonhly Byrd 1-1 -96 xxx-xx-three one five nine 2630 w Somerset Phila pa 19132."

On July 13, 2020 at 9:35am, Jackson sends an electronic message to Simms and states: "I got you back 10k ANDREW987@ aNDREW987@." Your Affiant notes that the username associated with Simms' PUA application is "Andrew987."

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding the PUA claim of Andrew Simms. Pennsylvania L&I records show that the PUA application for Simms was submitted electronically on July 13, 2020 by an IP address outside of a PA Department of Corrections facility. Your Affiant notes that Simms was incarcerated on this date, thus making him ineligible to receive PUA. Furthermore, Your Affiant notes that Simms was not unemployed due to Covid-19, which also means that he would be ineligible to receive PUA.

The Pennsylvania Department of Labor and Industry provided PUA payment information, the last 4 digits of the US Bank Debit Cards where the funds were placed and the address where the debit cards were to be sent. In response to the application submitted on July 13, 2020 using

Simms' name, date of birth and social security number, Pennsylvania L&I generated a US Bank Debit card ending in 2719. Although Jackson claims to have gotten Simms \$10,000 in PUA, the Pennsylvania L&I has no record of payment to Simms' debit card. Pennsylvania L&I provided application records showing that the address where the card would have been sent was 255 Woodbridge Road, Clifton Heights, PA 19018.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of his knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant, Andrew Lashawn Simms.

I, SA ROBERT MCHUGH #516, 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.

Robert M. Hugh
Special Agent

Sworn to me and subscribed this 21 day of September 2020
Robert M. Hugh Date _____, Magisterial District Judge

My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHINMagisterial District Number: 12-3-04
MDJ: Hon. Dominic A. Pelino
Address: 576 East Main Street
Hummelstown, PA 17036

Telephone: (717)583-1912

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

TODD

A

BUTLER

First Name

Middle Name

Last Name

SCI Benner Township, 301 Institution Drive,
Bellefonte, PA 16823

NCIC Extradition Code Type

- | | | | |
|--|---|--|--|
| <input checked="" 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>09-246-20</u>		Date Filed <u>9/22/20</u>		OTN/LiveScan Number <u>09159371</u>		Complaint/Incident Number <u>OCC-20-0020</u>		Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		DOB 09/19/1979		POB Pa		Add'l DOB / /		Co-Defendant(s) <input checked="" 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 checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown									
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)		<input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> ONG (Orange)		<input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White)		<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)		<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	
Eye Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> HAZ (Hazel)		<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)		<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)		<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)		<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		DNA Location				WEIGHT (lbs.)		140	
FBI Number		MNU Number				Ft. HEIGHT In.		5 8	
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									
Fingerprint Classification:									
DEFENDANT VEHICLE INFORMATION									
Plate #		State		Haz mat <input type="checkbox"/>		Registration Sticker (MM/YY) /		Comm'l Veh. Ind. <input type="checkbox"/>	
VIN		Year		Make		Model		Style	
								Color	
								Reg. same as Def. <input type="checkbox"/>	

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).

HEATHER A. CASTELLINO, SDAG

(Name of the attorney for the Commonwealth)

Approved via Photos

(Signature of the attorney for the Commonwealth)

09/22/2020

(Date)

I, SPECIAL AGENT CHRISTOPHER WEAVER

BADGE #603

(Name of the Affiant)

(PSP/MPOETC -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 [301] PA Dept Of Labor And Industry,
651 Boas St, Harrisburg, Pa (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about MARCH 12, 2020 TO AUGUST 31, 2020



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

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.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/> 1	3921	a	of the	TITLE 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
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: The Defendant did, take or exercise unlawful control over movable property of another, with the intent to deprive him thereof. The Defendant also committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 2	3921	a	of the	TITLE 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
------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

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

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Unlawful Taking or Disposition, Title 18, Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 3	3922	a 3	of the	TITLE 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
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Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: The defendant did intentionally obtains or withhold property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 4	3922	a 3	of the	TITLE 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 CONSPIRACY**

Acts of the accused associated with this Offense: The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Deception, did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, between June of 2020 and September of 2020, within the County of Dauphin, Centre, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crimes of theft by deception in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> 5	3925	a	of the	TITLE 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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The Defendant did, intentionally receive, retain or dispose of movable property of another knowing that it had been stolen or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner.

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>02-2116-20</u>	Date Filed: <u>9/21/20</u>	OTN/LiveScan Number <u>U915437-1</u>	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

- 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 20
- 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.

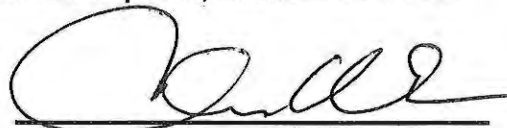
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

SEPTEMBER 22

2020

(Date)

(Year)


(Signature of Affiant)

AND NOW, on this date

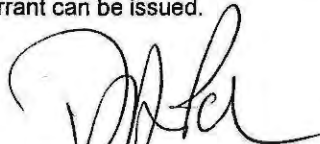
9/21/2020

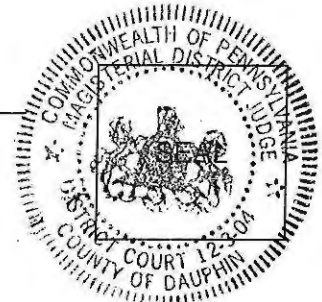
I certify that the complaint has been properly completed and verified.

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

12-3-041

(Magisterial District Court Number)


(Issuing Authority)



**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

AFFIDAVIT of PROBABLE CAUSE

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords. Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

The Pennsylvania Department of Labor and Industry reported that Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all applied for PUA in March of 2020 and all except Neff Zonge received PUA benefit payments. Based upon their dates of incarceration none of the inmates would have been eligible for PUA benefit payments.

Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig are all currently inmates at the State Correctional Institution Benner located in Benner Township in Centre County, PA. Department of Corrections information indicated that Todd A. Butler has been incarcerated from 2000 to present, Jacob P. Snook has been incarcerated from 2016 to present, James E. Sullivan has been incarcerated from 2016 to present, Derek L. Young has been incarcerated from 2019 to present, Ronald E. Baker has been incarcerated since 2013 to present, James G. Neff Zonge has been incarcerated since 2019 to present, Michael C. Lyter has been incarcerated since 2009 to present, James M. Leidig has been incarcerated since 2017 to present, and Joseph E. Klecha has been incarcerated since 2012 to present.

Pennsylvania Department of Labor and Industry records showed that all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig had their applications filed from the same IP address 71.207.11.46. Your Affiant conducted a search and determined that IP address 71.207.11.46 is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Jacob P. Snook's claim. Pennsylvania Department of Labor and Industry records show that Snook's application for PUA was submitted on June 12, 2020. On the

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

application it was reported that Snook's last day of employment was 3/13/2020. Your Affiant notes that Snook was incarcerated on the date his application was submitted. Additionally, records show that Snook's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Snook. Records show that Snook received payments on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$10,125.00. The payments were from the last day of work listed on Snook's application to present. These payments directly coincide with the time that Snook was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 6072. This card was sent to 1731 Blue Course Drive, PA. Phone number 814-826-8555 was used on the application as Snook's phone number. As a part of this investigation, your Affiant conducted a property records search and determined that Donald Moore and Adele Moore live at this address. Snook is from Centre County and his girlfriend is Adele Moore.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James E. Sullivan's claim. Pennsylvania Department of Labor and Industry records show that Sullivan's application for PUA was submitted on June 16, 2020. On the application it was reported that Sullivan's last day of employment was 3/18/2020. Your Affiant notes that Sullivan was incarcerated on the date his application was submitted. Additionally, records show that Sullivan's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Sullivan. Records show that Sullivan received payments on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Sullivan's application to present. These payments directly coincide with the time that Sullivan was incarcerated at SCI Benner. The PUA

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

payments were made using a US Bank pre-paid debit card with the last four numbers 6664. This card was sent to 138 High Blue Ave, Hawley, PA in Wayne County. As a part of this investigation, your Affiant conducted a property records search and determined that Julia Sullivan lives at this address. Records check indicated that Young is from the Wayne County area and that his mother is Julia Sullivan.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Todd A. Butler's claim. Pennsylvania Department of Labor and Industry records show that Butler's application for PUA was submitted on June 17, 2020. On the application it was reported that Butler's last day of employment was 3/18/2020. Your Affiant notes that Butler was incarcerated on the date his application was submitted. Additionally, records show that Butler's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Butler. Records show that Butler received payments on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Butler's application to present. These payments directly coincide with the time that Butler was incarcerated at SCI Benner. The PUA payments were made by check and using a US Bank pre-paid debit card with the last four numbers 7797. This card was sent to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. As a part of this investigation, your Affiant conducted a property records search and determined that James Zonge lives at this address and the property was recently listed for sale. Todd Butler has never lived in Centre County and prior to his incarceration he resided in the Ohio and Pittsburgh areas. James Zonge is the father of James Neff Zonge who is currently incarcerated at SCI Benner.

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The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Derek L. Young's claim. Pennsylvania Department of Labor and Industry records show that Young's application for PUA was submitted on June 12, 2020. On the application it was reported that Young's last day of employment was 3/18/2020. Your Affiant notes that Young was incarcerated on the date his application was submitted. Additionally, records show that Young's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Young. Records show that Young received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$9930.00. The payments were from the last day of work listed on Young's application to present. These payments directly coincide with the time that Young was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 0093. This card was sent to 574 Lehman Drive, Watsonstown, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Larry and Stephanie Young live at this address. Young is from the Watsonstown, PA area and his mother is Stephanie Young.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Ronald E. Baker's claim. Pennsylvania Department of Labor and Industry records show that Baker's application for PUA was submitted on June 30, 2020. On the application it was reported that Baker's last day of employment was 3/18/2020. Your Affiant notes that Baker was incarcerated on the date his application was submitted. Additionally, records show that Baker's application was submitted by an individual using IP Address IP address 71.207.11.46.

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The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Baker. Records show that Baker received payments on 7/1/20, 7/9/20, 7/15/20, and 7/21/20. The total for all the payments was \$13,110.00. The payments were from the last day of work listed on Baker's application to present. These payments directly coincide with the time that Baker was incarcerated at SCI Benner. The PUA payments were made by checks sent to 44 Glen Ave, Glenrock, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Rose M. Yetter resides at this address. Records search shows that Baker is from Glenrock, PA and his mother is Rose M. Yetter.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Michael C. Lyter's claim. Pennsylvania Department of Labor and Industry records show that Lyter's application for PUA was submitted on June 25, 2020. On the application it was reported that Lyter's last day of employment was 3/18/2020. Your Affiant notes that Lyter was incarcerated on the date his application was submitted. Additionally, records show that Lyter's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Lyter. Records show that Lyter received payments on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Lyter's application to present. These payments directly coincide with the time that Lyter was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 0490. This card was sent to 96 Peach Road, Liverpool, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Savannah Lyter lives at this address. Savannah Lyter is the wife of Michael C. Lyter.

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The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Joseph E. Klecha's claim. Pennsylvania Department of Labor and Industry records show that Klecha's application for PUA was submitted on June 27, 2020. On the application it was reported that Klecha's last day of employment was 3/18/2020. Your Affiant notes that Klecha was incarcerated on the date his application was submitted. Additionally, records show that Klecha's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Klecha. Records show that Klecha received payments on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the payments was \$12,315.00. The payments were from the last day of work listed on Klecha's application to present. These payments directly coincide with the time that Klecha was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 2915. This card was sent to 322 Charles Rd, Montrose, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Joanne (Klecha) Hogan lives at this address. Joanne (Klecha) Hogan is the mother of Joseph E. Klecha.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding James M Leidig's claim. Pennsylvania Department of Labor and Industry records show that Leidig's application for PUA was submitted on June 22, 2020. On the application it was reported that Leidig's last day of employment was 3/18/2020. Your Affiant notes that Leidig was incarcerated on the date his application was submitted. Additionally, records show that Leidig's application was submitted by an individual using IP Address IP address 71.207.11.46.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Leidig. Records show that Leidig received payments on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The total for all the

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payments was \$22,245.00. The payments were from the last day of work listed on Leidig's application to present. These payments directly coincide with the time that Leidig was incarcerated at SCI Benner. The PUA payments were made using a US Bank pre-paid debit card with the last four digits 4556. This card was sent to 6659 Nunnery Rd, Waynesboro, PA. As a part of this investigation, your Affiant conducted a property records search and determined that Serena Snyder lives at this address. Serena Snyder is the girlfriend of James M. Leidig.

All SCI Benner inmates Snook, Sullivan, Butler, Young, Baker, Neff Zonge, Lyter, Klecha, and Leidig had their applications submitted by IP address 71.207.11.46 which is owned by Comcast Cable Communications, LLC, 1800 Bishops Gate Blvd, Mt. Laurel, NJ 08054 in the same week in June of 2020. All inmates were incarcerated for the entire 2020 year but all listed on their applications their last day of work as March of 2020.

Your Affiant was able to identify the phone number 814-826-8555 that was used to submit the first application for inmate Jacob Snook. Checks online and with the State College Police Department determined that the phone number belonged to an Adele B. Moore who resides at 1731 Blue Course Drive, State College, PA. Adele Moore's address was also the address used on Jacob Snook's application and where the US Bank Debit card was mailed. State College Police also reported that based upon prior incidents they believed that Snook and Moore were boyfriend and girlfriend.

On 8/13/20 your Affiant went to 2088 Halfmoon Valley Road, Port Matilda, PA in Centre County. Your Affiant interviewed the home owner James Zonge. Zonge stated that he had received a letter from the unemployment office for a Todd Butler. Zonge stated his son James Neff-Zonge is in SCI Benner and had asked him to allow a friend Todd Butler to use his address. Zonge stated that his son told him that his friend had just gotten out of jail and needed help getting back on his feet. Zonge reported that when the letter came his son Neff-Zonge advised him to call a female friend and she would come pick the letter up. Zonge stated that the girl was a friend of his sons and provided the name Adele Moore and gave her phone number as 814-826-8555. Zonge stated that he had made arrangements



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for Adele Moore to pick up the letter for Todd Butler though his sister due to him being out of town. Zonge stated that to his knowledge Adele Moore received the letter from his sister.

On 8/14/20 your Affiant located and interviewed Adele B. Moore at the State College Police Department. Moore was advised of the investigation and the information that had been obtained from all the involved agencies. Adele Moore who was visibly upset admitted that she is inmate Jacob Snook's girlfriend and admitted that she had submitted the PUA Applications for the inmates involved. Moore stated that she first got the idea from Jacob Snook when he was in SCI Huntingdon. Moore stated that Snook told her to file the application and then he got transferred to SCI Benner. Moore stated that on 6/12/20 she submitted the PUA application online for Jacob Snook. Moore stated that she is also friends with and talks with SCI Benner inmate James Neff Zonge whom she knew from them both living in Centre County, PA. Moore reported that during conversations with Neff Zonge she told him what she did for Snook regarding the unemployment application and Neff Zonge asked her to fill out an application for him. Moore stated that she tried to fill out the PUA application for Neff Zonge but could not complete the application with Neff Zonge's social security number. Moore stated that she then told Neff Zonge that his application did not work and he then gave her name and information on other inmates to submit applications. Moore stated that she then submitted applications for SCI Benner inmates James Sullivan, Todd Butler, Derek Davis, Ronald Baker, and other inmates. Moore indicated that not all applications she submitted worked. Moore stated that she submitted all the applications from her residence. Moore stated that the residence belongs to her father Donald Moore and that the internet provider that her father uses is Comcast Cable. Moore stated that she received or obtained the debit cards for Jacob Snook and Todd Butler. Moore stated that inmate Butler is not from Pennsylvania and did not have anyone to help him on the outside or a PA address. Moore stated that they used James Neff-Zonge's father and his father's address for Todd Butler's application. Moore stated that the other debit cards were sent to the inmate's families or friends and then the family member or friend activated and used the debit cards. Moore stated that the arrangement

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was that Moore would receive \$500 from the inmate's family member or friend for her filling out the applications. Moore used the debit cards in Jacob Snook and Todd Butler to put money in Snook, Butler, and Neff Zonge's JPay accounts using her name and a fake name of Christina Fisher. Moore stated that she also withdrew money on a daily basis and spent some of it on miscellaneous items for herself. Moore was asked where the remaining approximately \$7000.00 was spent and she stated that she paid her bills, paid her probation fines and costs, gave James Neff-Zonge's mother Linda Neff cash, and a large portion of the money was used by her at a medical marijuana dispensary in State College. Moore was asked where the debit cards for Snook and Butler were currently located and she pulled the debit cards for Snook and Butler out of her wallet. Moore turned the cards over to your Affiant. Moore stated that she was unsure if the cards had any remaining balances on them. Moore stated that she did receive \$500 from a family member of inmate Derek Young through a mobile app called "Cash App". Moore stated that she receive \$500 from a family member of inmate James Sullivan through the mobile app "Cash App". Moore stated that she also received \$500 from a family member of inmate Ronald Baker through a check in the mail because the person reportedly Baker's elderly mother did not have access to the mobile app. Moore stated that she knew that the filing for the PUA money was illegal and expressed concern over going to jail and others being arrested.

Affiant reviewed prison phone calls from June, July, august between Adele Moore and inmate James Neff Zonge and inmate Jacob Snook. Moore talks extensively about filing for the PUA money and discussing how to avoid being caught and concern over being charged criminally if caught. Moore made and received multiple calls and messages from inmates to assist in the filing of the applications and the distributions of the funds to herself and involved inmates. On July 16, 2020 Adele Moore had a conversation by phone with Jacob Snook. During the phone call Moore tells Snook that James Neff Zonge provides her with the inmate name and she then fills out the application. Moore states that she sends the money to the inmates "people" and when they receive the money the send \$2000.00 by Cash App to Neff Zonge's mother. Moore states that Neff Zonge's mother then gives her \$1000.00.



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Affiant also reviewed Department of Labor and Industry records and determined that Adele Moore had filed for numerous inmates and had filed PUA applications for more inmates that she had admitted to during her interview on 8/14/20.

On 8/20/20 Affiant spoke with Linda Neff the mother of inmate James Neff Zonge. Linda Neff who lives at 1850 North Oak Lane, State College, PA 16803 stated that she did receive money from Adele Moore and place the money on her sons prison account. Linda Neff stated that she believed that the money was from friend and did not know it was illegally obtained money from unemployment.

The Pennsylvania Department of Labor and Industry also provided information that James Neff Zonge was issued a US Bank pre-paid debit card with the last four digits 1282 and that the card was sent to Neff Zonge's mother's address at 1850 North Oak Lane, State College, PA 16803. Neff Zonge was issued a US Bank debit cards but no funds were deposited in the account.

On 8/21/20 Affiant spoke with Stephanie Young the mother of inmate Derek Young. Stephanie Young was in possession of the US Bank debit card and turned over the card you your Affiant. Stephanie Young was also in possession of \$2000.00 cash that she had withdrawn and placed in a safe in her home. Young stated that her son had instructed her what to do with the debit card from prison and told her that it was old unemployment related to a settlement which was owed to him. Young stated that she withdrew money from the card and placed money on her sons prison account. Young stated that she was suspicious because she was also instructed to send money to Adele Moore and Linda Neff for them filling out the paperwork for the money. Young provided screenshots of Cash App transaction from her phone from July 1, 2020 and July 2, 2020 where she sent Linda Neff a total of \$2000.00 (two \$1000.00 payments). Young also provided a screenshot of a Cash App transaction from July 27, 2020 where she sent Adele Moore \$500.00. Young stated that she was instructed by her son Derek Young to pay Linda Neff and Adele Moore for their help with obtaining the money.

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Your Affiant obtained the SCI Benner inmate money account information "JPay" for all the inmates involved. All the inmates involved Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig all had payments placed on their JPay accounts on or around the time of each of the PUA payments that were deposited on the US Bank pre-paid debit card for the inmates.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Jacob P. Snook debit card on 6/15/20, 6/23/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Snook received money on his account from Adele Moore on 6/25/20, 6/29/20, 7/2/20, 7/5/20, 7/9/20, 7/12/20, 7/13/20, 7/17/20, 7/23/20, and 7/27/20. The total amount deposited on Jacob Snook's JPay account by Adele Moore was \$3150.00.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Todd A. Butler's debit card on 6/18/20, 6/26/20, 6/30/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Butler received money on his account from Christina Fisher an alias used by Adele Moore on 6/28/20, 7/1/20, 7/5/20, 7/9/20, 7/13/20, 7/17/20, 7/25/20, 7/29/20, and 8/10/20. The total amount deposited on Todd Butler's JPay account by Adele Moore was \$2000.00.

The SCI Benner inmate money account JPay showed that James Neff Zonge received money on his account from Linda Neff on 6/22/20, 6/26/20, 6/30/20, 7/4/20, 7/8/20, 7/9/20, 7/12/20, 7/15/20, 7/19/20, 7/23/20, 7/27/20, 7/29/20, and 7/30/20. The total amount deposited on Neff Zonge's JPay account by Linda Neff was \$3150.00. Linda Neff is the mother of inmate James Neff Zonge and her address is 1850 N. Oak Lane, State College, PA.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Derek L. Young's debit card on 6/23/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed

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that Young received money on his account from Stephanie L. Young on 6/23/20, 6/26/20, 7/4/20, 7/11/20, 7/18/20, 7/25/20, 7/28/20, 8/1/20, 8/7/20, and 8/9/20. The total amount deposited on Derek Young's JPay account by Stephanie L. Young was \$970.00. Records check indicated that Stephanie L. Young is the name of inmate Derek Young's mother and her address is 574 Lehman Drive, Watsonstown, PA. This is the same address used on Young's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James E. Sullivan's debit card on 6/17/20, 6/26/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Sullivan received money on his account from Julia Sullivan on 6/17/20, 7/7/20, 7/10/20, 7/26/20, and 8/7/20. The total amount deposited on James Sullivan's JPay account by Julia Sullivan was \$700.00. Records check indicated that Julia Sullivan is the name of inmate James Sullivan's mother and her address is 138 High Blue Ave, Hawley, PA. This is the same address used on Sullivan's PUA application and where his US Bank debit card was mailed. Contacted was made with Julia Sullivan and she was in possession of the US Bank Debit card in James Sullivan's name and was also in possession of \$9000 that she had withdrawn at her son's request using the debit card.

The Pennsylvania Department of Labor and Industry records show that PUA payment checks were sent to Ronald E. Baker on 7/1/20, 7/9/20, 7/15/20 and 7/21/20. The SCI Benner inmate money account JPay showed that Baker received money on his account from Rose M. Yetter on 7/17/20, 7/25/20, 7/31/20, and 8/10/20. The total amount deposited on Ronald Baker's JPay account by Rose M. Yetter was \$1000.00. Records check indicated that Rose M. Yetter is the name of inmate Ronald Baker's mother and her address is 44 Glen Ave, Glenrock, PA. This is the same address used on Baker's PUA application and where his checks were mailed.

On 8/20/20 Affiant spoke with Rose M. Yetter. Rose Yetter is the elderly mother of inmate Ronald Baker and owns the house at 44 Glen Ave, Glenrock, PA. Yetter stated that her son had lived at the address and she owns the property.

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Yetter was asked if she had been receiving unemployment money for her son Ronald. Yetter stated that her son Ronald called her from prison and told her that he would be getting unemployment and when she received money she was to put money on his account and use some of the money to help pay her bills. Yetter reported that she gets checks sent to her and she then puts money on her sons account. Yetter stated that she does not know who sends her the money. Yetter stated that she had also sent a personal check to a girl for helping her son get his unemployment but she could not recall the girl's name.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Michael C. Lyter's debit card on 6/26/20, 7/3/20, 7/9/20, and 7/14/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter 8/2/20 and 8/16/20. The total amount deposited on Derek Young's JPay account by Savanna Lyter was \$3000.00. Records check indicated that Savanna Lyter is the name of inmate Michael Lyter's wife and her address is 96 Peach Rd, Liverpool, PA. This is the same address used on Lyter's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on Joseph E. Klecha's debit card on 6/29/20, 7/3/20, 7/9/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Klecha received money on his account from Joanne Klecha 7/7/20, 7/18/20, 8/9/20, 8/15/20, 8/24/20 and 8/26/20. The total amount deposited on Joseph Klecha's JPay account by Joanne Klecha was \$370.00. Records check indicated that Joanne Lyter is the name of inmate Joseph Klecha's mother and her address is 322 Charles Rd, Montrose, PA. This is the same address used on Klecha's PUA application and where his US Bank debit card was mailed.

The Pennsylvania Department of Labor and Industry records show that PUA payments were deposited on James M. Leidig's debit card on 6/23/20, 7/3/20, and 7/15/20. The SCI Benner inmate money account JPay showed that Lyter received money on his account from Savanna Lyter (Michael Lyter's wife) on 7/7/20, Christina B. Fisher (Adele

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Moore) on 7/17/20, and from Stephanie Young (Derek Young's mother) on 7/4/20, 7/25/20, 8/1/20, 8/9/20, 8/16/20, 8/23/20, 8/30/20. The total amount deposited on James Leidig's JPay account was \$465.00.

On 9/2/20 your Affiant interviewed all the inmates involved: Jacob P. Snook, Todd A. Butler, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig at SCI Benner.

Jacob P. Snook, Derek L. Young, James E. Sullivan, James Neff Zonge, Ronald E. Baker, James G. Neff Zonge, Michael C. Lyter, Joseph E. Klecha, and James M. Leidig admitted to their involvement in receiving the unemployment money. Inmate Todd Butler made no statements. James Neff Zonge stated that Adele Moore asked him if he wanted to apply for the unemployment and he agreed and then provided her with other inmate's names for her to fill out applications.

Affiant reviewed prison phone calls and messages between Adele Moore and Jacob Snook and Adele Moore and James Neff Zonge. Affiant confirmed through the messages that Adele Moore first applied for PUA for herself and Snook then spoke with Neff Zonge and he provided her with his information the additional inmate names and information. Neff Zonge provided the inmate information and discussed filing the application and how the money would be shared and dispersed over the phone with Adele Moore.

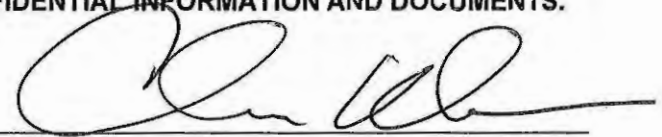


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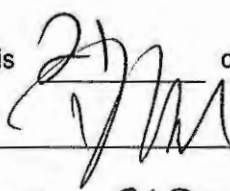
Docket Number: 02-246-20	Date Filed: 9/21/20	OTN/LiveScan Number: V915937-1	Complaint/Incident Number: OCC-20-0020
Defendant Name:	First: TODD	Middle: A	Last: BUTLER

I, SPECIAL AGENT CHRISTOPHER WEAVER, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



(Signature of Affiant)

Sworn to me and subscribed before me this 21 day of September 2020
9/21/20 Date , Magisterial District Judge
 My commission expires first Monday of January, 2022



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 12-3-04
MDJ Name: Hon. DOMINIC PELINO
Address: 676 EAST MAIN STREET
HUMMELSTOWN, PA
17036
Telephone: (717) 583-1912

DEFENDANT: (NAME and ADDRESS):
DWAYNE WASHINGTON
First Name Middle Name Last Name Gen.
SCI PHOENIX
1200 MOKYCHIC ROAD
COLLEGEVILLE, PA 19426

NCIC EXTRADITION CODE TYPE

☒ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States Distance:
☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending
☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: 09-247-20 Date Filed: 09/22/20 OTN/LiveScan Number: U91594-4 Complaint/Incident Number: OCE-20-0029 Request Lab Services? ☐ YES ☒ NO

GENDER: ☒ Male ☐ Female DOB: 09/22/1993 POB: Add'l DOB: Co-Defendant(s) ☐
AKA First Name: Middle Name: Last Name: Gen.

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

ETHNICITY: ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR: ☐ GRY (Gray) ☐ RED (Red / Auburn) ☐ 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: UNKNOWN

FBI Number: MNU Number: Ft. HEIGHT In.

Defendant Fingerprinted: ☐ YES ☒ NO 6 0

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat	Registration Sticker (MM/YY)	Comm'l Veh. Ind.	School Veh.	Oth. NCIC Veh. Code	Reg. same as Def.
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. Pa.R.Crim.P. 607.)

SDAG HEATHER CASTELLINO
(Name of Attorney for Commonwealth - Please Print or Type)

Approved via Phone
(Signature of Attorney for Commonwealth)

09/22/2020
(Date)

I, SPECIAL AGENT ROBERT MCHUGH
(Name of Affiant - Please Print or Type)

#516
(PSP/PA/PO/ETC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania Office of Attorney General and Pennsylvania State Police.
(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 is 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 PA DEPARTMENT OF LABOR & INDUSTRY, 651
(Subdivision Code) BOAS STREET, HARRISBURG, PA 17121
(Place/Political Subdivision)

in DAUPHIN County

22
(County Code)

on or about JULY 7, 2020 TO AUGUST 5, 2020
(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>C24220</i>	Date Filed: 09/22/20	OTN/LiveScan Number <i>U915446-4</i>	Complaint/Incident Number OCE-20-0029
Defendant Name	First: DWAYNE	Middle:	Last: WASHINGTON

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: 0
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<input checked="" type="checkbox"/> Lead?	1	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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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):

THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant unlawfully took or exercised unlawful control over movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. TO WIT: During the COVID-19 pandemic, Dwayne WASHINGTON, and others on his behalf, falsley filed an application for the Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website even though WASHINGTON did not qualify for those funds.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	2	3921	(a)	of the	Title 18 , PA Crimes Code	1	F2		
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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):

CRIMINAL CONSPIRACY - THEFT BY UNLAWFUL TAKING OR DISPOSITION

Acts of the accused associated with this Offense:

The Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft By Unlawful Taking Or Disposition, Title 18 Section 3921(a), did agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime, that is, during the time frame above, within the County of Dauphin, Montgomery and Philadelphia, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903..



POLICE CRIMINAL COMPLAINT

Docket Number: CL-24720	Date Filed: 09/22/20	OTN/LiveScan Number U915940-4	Complaint/Incident Number OCE-20-0029
Defendant Name	First: DWAYNE	Middle:	Last: WASHINGTON

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	7512	(a)	of the	Title 18, PA Crimes Code	1	F3		
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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:
In that the Defendant, 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 or under the act of April 14, 1972 (P.L.233, No.64), known as the Controll Substance Drug, Device and Cosmetic Act. TO WIT: Dwayne WASHINGTON and others utilized electronic communications through the Department of Corrections SCI Phoenix electronic messaging system to send names, dates of birth and social security numbers to be used to submit fraudulent Pandemic Unemployment Assistance applications on the PA Department of Labor and Industry Website.

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: 0
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<input type="checkbox"/> Lead?	4	3922	(a)(3)	of the	Title 18, PA Crimes Code	1	F3		
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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:
In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently preform the promise. TO WIT: Dwayne WASHINGTON and others falsely filed an application for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for WASHINGTON even though he did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct. The PA Department of Labor and Industry sent \$3,510.00 to WASHINGTON based off of his fraudulent PUA application.



POLICE CRIMINAL COMPLAINT

Docket Number: CL-84920	Date Filed: 09/22/20	OTN/LiveScan Number: U915440-4	Complaint/Incident Number OCE-20-0029
Defendant Name	First: DWAYNE	Middle:	Last: WASHINGTON

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 checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	5	3922	(a)(3)	of the	Title 18 , PA Crimes Code	1	F3		
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Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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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):

CRIMINAL CONSPIRACY – THEFT BY DECEPTION

Acts of the accused associated with this Offense:

In that the Defendant did intentionally obtain or withhold property of another by deception. A person deceives if he 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 did not subsequently perform the promise. TO WIT: Dwayne WASHINGTON and others falsely filed an application for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for WASHINGTON even though he did not qualify for the benefits. On each application, the applicant must certify the information they provided is true and correct. The PA Department of Labor and Industry sent \$3,510.00 to WASHINGTON based off of his fraudulent PUA application.

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: 0
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<input type="checkbox"/> Lead?				of the					
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Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
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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):

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

Docket Number: <u>05247-80</u>	Date Filed: 09/22/20	OTN/LiveScan Number: <u>U915940-4</u>	Complaint/Incident Number OCE-20-0029
Defendant Name	First: DWAYNE	Middle:	Last: WASHINGTON

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. §4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 3
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently 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.)

SEPTEMBER 22, 2020
(Date)

(Signature of Affiant)

AND NOW, on this date, 9/21/2020 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.

12304
(Magisterial District Court Number)

(Issuing Authority)



COMMONWEALTH OF PENNSYLVANIA

v.

Dwayne Washington

AFFIDAVIT OF PROBABLE CAUSE

Your Affiant, Special Agent Robert McHugh, Office of Attorney General, Bureau of Criminal Investigations being duly sworn, deposes and says:

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the **Pandemic Unemployment Assistance (PUA)** program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: **"Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being**

paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution."

On June 1, 2020, the OAG received a referral letter from the Governor's Office requesting that this agency investigate instances of PUA fraud.

FINDINGS OF FACT

Dwayne Washington was convicted of Robbery on March 23, 2016 and sentenced to seven to fifteen years in prison. Washington is currently incarcerated at State Correctional Institution – Phoenix, located at 1200 Mokychic Road, Collegeville, PA 19426. Washington has remained in custody since March 28, 2016 and has no record of employment according to PA Department of Labor and Industry (L&I) records.

While incarcerated at SCI Phoenix, Washington has the ability to communicate with individuals outside of prison using the telephone, U.S. Mail or electronic messages through a GTL tablet. All of these methods of communication are monitored by PA Department of Corrections staff. Washington has had multiple messages "flagged" by PA Department of Corrections staff related to potential PUA fraud.

On July 7, 2020 at 7:55am, Washington sent an electronic message through his GTL tablet to an individual identified as Jezkae Jackson: "xxx xx 6629) 9-22-93 dwayne z washington..... And

for the address call 267-518-7536 her name is sharhonda tell her wht is for and wht ever she have to do.... But tell me first how much its going to b before you tell her... I trust you bro.”

Only July 7, 2020 at 7:57am, Washington then sends a message to an individual identified as Sharhonda Tucker: “you gone get a call from 267-368-1830 and he gone tell u whts up... His name k.....”

On July 7, 2020 at 9:40am, Jackson responded to Washington and messaged the following: “it’s going to be 7605.00 after taxes... if I dont take taxes out then it should be around 9k... and I gotchu bro trust me man.”

On July 7, 2020 at 10:55am, Sharhonda Tucker sends the following message to Washington: “The bul called but he said he said he gonna call me bck.”

On July 7, 2020 at 8:51pm, Jackson sent another message to Washington: “ard the initial claim its gonna be a lump sum anywhere from 6k to 9k I’ll let you know.. and then every week til the 27th of July you’ll get \$795... before taxes... then after that youll just get 195 before taxes... and its gonna take around 7 - 10 days , I call the girl but I called when I was getting my physical for my permitt... btw I got my permitt GANG !... before i do it I got to make sure she on board... and once I buy this wheel imma send some pictures.. I bagged this white bitch at pennDOT... them jawns WAS PACKED ... We went all the way near k.o.p. for a shorter wait ! and all I want is 1k... but you know you’ll get that back bro.”

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding the PUA claim of Dwayne Washington. Pennsylvania L&I records show that the PUA application for Washington was submitted electronically on July 9, 2020 by an IP address outside of a PA Department of Corrections facility. Your Affiant notes that Washington was incarcerated on this

date, thus making him ineligible to receive PUA. Furthermore, Your Affiant notes that Washington was not unemployed due to COVID-19, which also means that he would be ineligible to receive PUA.

The Pennsylvania Department of Labor and Industry provided PUA payment information, the last 4 digits of the US Bank Debit Cards where the funds were placed and the address where the debit cards were to be sent. In response to the application submitted on July 9, 2020 using Washington's name, date of birth and social security number, Pennsylvania L&I generated a US Bank Debit card ending in 6864. Payment records show that Washington received one PUA payment: \$3,510.00 on July 10, 2020. Pennsylvania L&I provided application records showing that the email listed for the Washington's account is jezkae@gmail.com and the address where the debit card was sent is 1218 S 23rd Street, Philadelphia, PA 19146.

Your Affiant conducted a review of Washington's "JPay" account, which documents who deposits money in to the account of each inmate, when the payment was made, how the payment was made and what IP address was used to make each electronic payment. Between July 7, 2020 (the date that Washington provided his name and personal identifiers to Jackson and also informed Tucker that she was going to be receiving a call from Jackson) and August 5, 2022, Washington has received deposits totaling \$675 from both Jezkae Jackson and Sharhonda Tucker. During this same timeframe, Washington has not received any other money deposited in to his "JPay" account. Through his training and experience, your Affiant is aware that increases in frequency and dollar amount of deposits is often indicative of a kickback scheme.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of his knowledge.

Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant, Dwayne Washington.

I, SA ROBERT MCHUGH #516, 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.

Robert M. Hugh
Special Agent

Sworn to me and subscribed this 21 day of September
9/21/20 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January, 2022

