POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA DAUPHIN VS. COUNTY OF: (NAME and ADDRESS): DEFENDANT: Magieterial District Number: 12-3-04 BARNES Ш DOMINIC PELINO LAMING MDJ Name: Hon. **LEROY** Address: 576 EAST MAIN STREET Gen. First Name. Middle Name Last Name HUMMELSTOWN, PA SCI PHOENIX 17036 1200 MOKYCHIC ROAD COLLEGEVILLE, PA 19426 (717) 583-1912 Telephone: NCIC EXTRADITION CODE TYPE Distance: C-Misdemeanor Surrounding States 5-Felony Pend. 🔀 1-Felony Fulf D-Misdemeanor No Extradition 6-Felony Pend, Extradition Determ. 2-Felony Ltd. E-Mlademeanor Pending A-Misdemeanor Full 3-Felony Surrounding States F-Misdemeanor Pending Extradition Determ. B-Misdemeanor Limited 4-Felony No Ext. DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/incident Number Date Filed OTN/LiveScan Number Docket/Number OCE-20-0030-2 ∏YES ⊠NO 09/22/20 Co-Defendant(s) Add'I DOB GENDER DOB 12/04/1991 POB ⊠ Male □ Female Gen. Last Name: Middle Name: First Name: **AKA** Unknown Native American RACE White Asian ⊠ Black Non-Hispanic Unknown ETHNICITY Hispanic BRO (Brown) BLU (Blue) PLE (Purple) SDY (Sandy) HAIR COLOR RED (Red / Aubn.) GRY (Gray) XXX (Unk. / Bald) GRN (Green) PNK (Pink) ONG (Orange) WHI (White) BLK (Black) BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BLU (Blue) BRO (Brown) **EYE COLOR** BLK (Black) HAZ (Hazel) XXX (Unknown) PNK (Plnk) MUL (Multicolored) MAR (Marcon) WEIGHT (lbs.) UNKNOWN DNA 🗌 YES 🛛 NO **DNA Location** Ft. HEIGHT In. MNU Number FBf Number 10 Defendant Fingerprinted YES X NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth. NCIC Veh. Code Registration Sticker (MM/YY) Comm'l Veh. Ind. Hazmat State Plate # Reg. П same as Def. Color Style Model Make VIN Year Office of the Attorney for the Commonwealth Approved Disapproved because: SDAG HEATHER CASTELLINO I, SPECIAL AGENT ROBERT MCHUGH POFTC - Assigned Affant ID Humber & Badge # of the Pennsylvania Office of Attorney General and Pennsylvania State Police, 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. PA DEPARTMENT OF LABOR & INDUSTRY, 651 with violating the penal laws of the Commonwealth of Pennsylvania at: BOAS STREET, HARRISBURG, PA 17121 (Place-Pofilical Subdivision) (Subdivision Code)

in DAUPHIN County

22 (County Code)

on or about JUNE 30, 2020 TO AUGUST 10, 2020

(Offense Oale)



	ke Numi	4520	Date Fi 09/22/2		OTN/L	Lyescan Number				Comple OCE-20		ident Number 2	
Defe	endant !	Name	First: LEROY			Middle: LAMING				Last: BARNE	:S III		
appr (Set for	opriate h <i>a briet</i> au	e. When thummary of the fa	iere is n cta sufficient	nore than to advise the do	ONE O	cribed below with ea ffense, each offense (the nature of the offense(s) charg the statute(s) or ordinance(s) alleg	sho	ould be noted the s	umbe	red chro	nologi	ically.	
Inchos Offens	ate	Attempt 18 901 A		Solicitati 18 902 A		Conspiracy 18 903	·		of Vict	ims Age 6	0 or Old	fer: O	
⊠ Lead?		1 392		of th		e 18 , PA Crimes Code	B	1	F2				
	Offense #		n Subsec		PA St	atute (Tille)		Counts	Grade	NCIC Offens	se Code	UCR/NIBRS Code	
	(if app	OT Data blicable)		Accident Number		☐ Interetate		□ sa	ıfaty Zoı	ne		☐ Work Zone	
State	ute De:	scription (THEFT BY	include ' UNLAY	the name	of sta	atute or ordinance): OR DISPOSITION		•					
catast COVI	rophe v D-19 p	which resul	ts in sub	stantial da		efendant committed the property, hardship, s							
Inchoat Offense	• [ent Assista			n even	rs on his behalf, falsel though BARNES did	y file	ed an appl	ication those	n for the le funds.	Pander	nic	6
Inchoat Offense	• [ent Assista		efit program	n even	rs on his behalf, falsel though BARNES did	y file	ed an appl qualify for	ication those	n for the le funds.	Pander	nic	е
Offense	e	Attempt 18 901 A		efit program	n even	rs on his behalf, falsel though BARNES did	y file	ed an appl qualify for	ication r those Victims	n for the le funds.	Pander	nic	е
Offense	e	Attempt 18 901 A 2 3921	nce bene	Solicitation 18 902 A of the	n even	though BARNES did	y file	ed an appl qualify for dumber of	ication those Victime	n for the le funds.	Pander	nic	е
Offense	e [Attempt 18 901 A 2 3921 Section	(a) Subsection	Solicitation 18 902 A of the	n even	rs on his behalf, falsel though BARNES did Conspiracy 18 903	y file	ed an appl qualify for dumber of	victims	n for the and a funds.	Pander Older	nic	e
Offense	Offense # PennDO (If applicate Des	Attempt 18 901 A 2 3921 Section T Data cable)	(a) Subsection N nclude 1	Solicitation 18 902 A of the ccident umber	Title	crs on his behalf, falsel though BARNES did Conspiracy 18 903 18 , PA Crimes Code alute (Title)	y file not o	ed an appliqualify for	victims	n for the and a funds.	Pander Older	nic O UCR/NIBRS Code	e



	Docket Nui	nber:	Date Filed 09/22/20	l: OT	N/LiveS	an Numic	894-	0					npiaint/ind E-20-0030	cident Number -2
	Defendan	Name	First: LEROY				Middle: LAMING					Las BAF	t: RNES III	
app (Set for summ	ropriate. odh a <i>brief</i> summ ary case, you m	When the nary of the fac	ere is more is sufficient to edu scific eection(s) ex	than on dee the defend nd subsection(s	e offen	se, each	offense s	shou I. A cite	ation to	e nur	nbere	d chro	nologica	edly violated, i lly, ore, is not sufficient. in a
Offe		Attempt 18 901 A		Bolicitation 18 902 A		Conspiracy 18 903	<u>'</u>	L	Num	ber of	Victim	s Age 6	0 or Older:	0
Lead,	,	3 7512	(a)	of the	Title	18 , PA (Crimes C	ode		1	F3			
	Offense #	Section	Subsection		PA State	ıte (Tille)			_	Counta	Grade	NCIC Of	ense Code	UCR/NIBRS Code
	PennDOT (if applic		Accid Num	- 1		Inters	tate			Safet	y Zone			Work Zone
			nclude the				ance):							
any Cont com- birth PA I	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 my 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 utilitized electronic communications through the Department of Corrections SCI Phoenix electronic messaging system to send names, dates of irth and social security numbers to be used to submit fraudulent Pandemic Unemployment Assistance applications on the A Department of Labor and Industry Website.													
Incho Offen	بعال	Attempt 18 901 A	<u> </u>	olicitation 9 902 A		Conspiracy 18 903		L	dumb	er of \	/ictims	Age 60	or Older:	0
 ead?	4	3922	(a)(3)	of the	Title	18, PA C	rimes Co	de .		1	мз			-
	Offense #	Section	Subsection		PA Statute	(Title)			Ç	ounts	Grade I	NCIC Offe	nse Code	UCR/NIBRS Code
	PennDOT	ole)	Accide Numb	et		☐ Interst				Safety	Zone	-		Nork Zone
			clude the I		statute	or ordina	nce):							
The I omn e int f mi ubse Inen	Defendant, nission of a entionally nd; but dec quently pr aployment	with interchat crime creates or eption as eform the Assistance	, in that he reinforces to a person promise. T	it theft by intentiona a false im 's intentio O WIT: L ogram ev	deception Illy obta Inpression In to per Identity Bar Ide	on, commined or winding including including form a praction of the property of	thheld prong false im omise shand others in ES did no	opert ipres II no false	ty of ssion t be i ly fil	anoth s as to inferred ed an	er by law, ed fro applie	decepti value, m the facation f	on. A per intention act alone or the Par	p toward the son deceives if or other state that he did not idemic blication, the



	Dociet	t Number	- - - -	Date File 09/22/20	d:	OTNIL	LiveScan Numbe	14-	ل					Complaint/ OCE-20-00	incident Number 30-2
	Defen	dant N	ame	First: LEROY_		<u> </u>		Middle LAMIN						.ast: BARNES III	
app (Set fo	ropria nh a <i>brie</i> sry case, pate	nte. When you must d	nen ther	e is mor	e than	ONE Clefendant of the colonial	scribed below volfense, each of the nature of the offens the statute(s) or ordinance of the statute(s) or ordinance of the second secon	ffense :e(s) charge	sho a. A c	uld be itation to t axed.	e nur	nbere	d chro	onologica	ore, is not sufficient. In a
						. 1				1	_	1	T		
Lead?		5	3922	(a)(3)	of		Title 18 , PA C	rimes (Code		1	M3		· · · · · · · · · · · · · · · · · · ·	
	Offens	nDOT Da	Section	Subsection	Ident	- P	'A Statute (Title)			-	Counts	Grade	NCIC O	ffense Code	UCR/NIBRS Code
		pplicable			nber		☐ Intersta	ite			Safet	y Zone			Work Zone
				clude the			atute or ordina	nce):				-			:
In the intermine subsetution the subsetution t	at the ational is but of a continuous at the con	Defend ly created decepti tly pref ment A	dant did tes or rei on as to form the	nforces a a person's promise. e progran	ally ob false i s inten TO W	tain or impress tion to IT: Le igh the	withhold proper sion, inleuding f perform a promiercy BARNES at PA Department tion, the application	alse impise shall nd other of Labo	press l not rs fal or an	sions a be inf Isely fi id Indu	s to lerred iled a stry	aw, va l from in app websi	alue, in the fac lication te for I	itention or at alone the for the P BARNES	other state of at he did not andemic even though he
inchos Offens		р—	tempt	1	Bolloitatio 18 902 A	on	Conspiracy			Numbe	er of \	/ictims	Age 60) or Older:	0
] .ead?		<u> </u>				of the									
	Offen	se #	Section	Subsection	n		PA Statute (Title)	Cou	nts	Grade	NCIC	Offense	Code	UCR/I	NIBRS Code
		DOT Date plicable)		Accid Num			☐ Interstate	e			Safety	Zone			Work Zone
Stat	ute De	escript	ion (inc	lude the	name	of sta	tute or ordinan	ce):							
Acts	of the	e accu	sed ass	ociated	with th	nis Off	ense:								



Packet Number:	Date Filed: 09/22/20	OTN/LiveScan Number	7740	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 2. 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 filling 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

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

AND NOW, on this date.

certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed before a warrant can be issued.

COMMONWEALTH OF PENNSYLVANIA

٧.

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:

"You 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.

Special Agent

Magisterial District J

Sworn to me and subscribed this day of September

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-3-04 MDJ: Hon. Dominic Pelino (NAME and ADDRESS): Address: 576 East Main Street KEITH CORPREW First Name Middle Name Last Name Hummelstown, PA 17036 SCI Mahanoy, 301 Morea Road Frackville, PA 17932 Telephone: (717)583-1912 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 Request Lab OTN/LiveScan Numbe Docket/Number **Date Filed** Complaint/Incident Number Services? ☐ YES ☐ NO 09/22/2020 OCC-20-0023 **GENDER** DOB 08/03/1959 Co-Defendant(s) Add'l DOB Gen. 🛛 Male First Name Middle Name Last Name ☐ Female AKA ☐ White ☐ Hispanic RACE Asian Native American Unknown **ETHNICITY** Non-Hispanic Unknown RED (Red/Aubn.) SDY (Sandy) BRO (Brown) GRY (Gray) BLU (Blue) PLE (Purple) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye ☐ HAZ (Hazel) PNK (Pink) Color MAR (Maroon) ☐ 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 State Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Haz Reg. Ind. mat same Plate # Sticker (MM/YY) П as Def. VIN Year Make Color Model Style 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** 09/22/2020 (Name of the attorney for the Commonwealth) KATHRYN GRADY 590 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # Pennsylvania Office of Attorney General PA0222400 of (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 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 in DAUPHIN County on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020 [22] (County Code)

POLICE CRIMINAL COMPLAINT Complaint/Incident Number OCC-20-0023 Middle: Last: Defendant Name: KEITH R 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 ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older _ 18 901 A 18 902 A 18 903 Offense \boxtimes 3921 of the Α 18 PA C.S.A. 1 F2 Offense NCIC Offense Lead? Section Subsection PA Statute (Title) Counts Grade UCR/NIBRS Code Code PennDOT Data Accident Number ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) 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 catastropher 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 ☐ Attempt ☐ Solicitation □ Conspiracy Number of Victims Age 60 or Older 18 902 A Offense 18 901 A 18 903 П 2 Α 3921 of the 18 PA C.S.A. 1 F2 NCIC Offense Lead? Offense# Section Subsection PA Statute (Title) Counts Grade UCR/NIBRS Code PennDOT Data **Accident Number** ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) 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, Schuykill 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. 8903. To Wit: Keith Corprew provided his Date of Birth and Social Security Number for the benefit program, to which \$10,520 was obtained. Inchoate ☐ Solicitation ☐ Attempt ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 П 3 3922 **A2** of the 18 PA C.S.A. 1 **F**3 Lead? Offense# Section Subsection PA Statute (Title) Grade Counts **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident Interstate ☐ Safety Zone ■ Work Zone (if applicable) Number 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. Keith Corprew provided his Date of Birth and Social Security number for the benefit program, to which \$10,520 was obtained.

POLICE CRIMINAL COMPLAINT Date Filed: Complaint/Incident Number OTWLiveScan Number OCC-20-0023 First Middle: Last: **Defendant Name:** KEITH R **CORPREW** Inchoate ☐ Attempt ☐ Solicitation □ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 4 3922 **A2** of the 18 PA C.S.A. 1 F3 Subsection Lead? Offense# PA Statute (Title) Grade NCIC Offense Code **UCR/NIBRS** Code Section Counts PennDOT Data Accident Interstate ☐ Safety Zone Work Zone Number (if applicable) 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, inleuding 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. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 903 Offense 18 902 A of the \Box 3925 18 PA.C.S.A. **F**3 PA Statute (Title) Lead? Offense# Section Subsection Counts Grade **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Work Zone ☐ Safety Zone Number (if applicable) 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 Muniford, 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. Inchoate ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903

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

Acts of the accused associated with this Offense:

PA Statute (Title)

Counts

☐ Interstate

Grade

NCIC Offense Code

☐ Safety Zone

of the

Subsection

П

Lead?

Offense#

PennDOT Data

(if applicable)

Section

Accident

Number

UCR/NIBRS Code

☐ Work Zone

			PO	LICE CRIMINAL COMPLAIN
ecket Number:	Pate Filed:	U OTN/Lives	San Number	Complaint/Incident Number OCC-20-0023
efendant Name:	First: KEITH	Middle:	Las CO	t: RPREW
I ask that a warra made.	nt of arrest or a si	ummons be issued an	d that the defendant be	e required to answer the charges I have
	ation is made sub	ject to the penalties o		of my knowledge or information and Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	nsists of the prece	eding page(s) number	ed <u>1</u> through	
	<i>lvania</i> that require			Access Policy of the Unified Judicial ts differently that non-confidential
of Pennsylvania and	were contrary to	the Act(s) of the Asser	mbly, or in violation of	ce and dignity of the Commonwealth the statutes cited. It be completed, sworn to before the
				KHrady
(Date)		(Year)		(Signature of Affiant)
AND NOW, on this date	· 9/2	1 Georgi	certify that the complaint	has been properly completed and verified.
An affidavit of probable	cause must be con	npleted before a warrant	can be tissued.	TH OF PARTY OF THE
(Magisterial District Cou	ırt Number)	(Issuing Au	uthority)	*

Docket Number:	Pate Filed:	OTN/LixeScan Number	er Complaint/Incident Number OCC-20-0023
$\mathcal{A}_{\mathbf{a}}$	First:	Middle:	Last:
Defendant Name:	KEITH	R	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



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

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.



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

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 COMMUNCIATIONS

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



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

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.



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
			OCC-20-0023
B. C. J. W. N.	First:	Middle:	Last:
Defendant Name:	KEITH	, R	CORPREW

- 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



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

In one communication, post marked June 24, 2020, Munford directs Danfora to "adjust the weeks or make it seem as the 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.



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

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.



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

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



Docket Number:	Date Filed: / /	OTN/LiveScar	n Number Complaint/Incident Number OCC-20-0023	_
	First:	Middle:	Last:	
Defendant Name:	KEITH	ŀ.R	CORPREW	

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



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

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	<u>Lgrimes887@gmail.com</u>	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



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



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

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



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



Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
	First:	Middle:	Last:
Defendant Name:	KEITH	İ R	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



	Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
i				OCC-20-0023
Į		First:	Middle:	Last:
ı	Defendant Name:	KEITH	- R	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

ħ			POLICE CRIMINAL COMPLAIN
Docket Number:	Pate Filed: U	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: KEITH	Middle: R	Last: CORPREW
0/2//20 Da	oscribed before me this(nte(res first Monday of January,	2 Day of L	(Signature of Afflant) (Signature of Afflant) Magisterial District Hudge THOF COURT

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-3-04 VS. MDJ: Hon. Dominic Pelino DEFENDANT: (NAME and ADDRESS): Address: 576 East Main Street WENDY DANFORA First Name Middle Name Last Name Hummelstown, PA 17036 941 S Pine Street York, PA 17404 Telephone: (717)583-1912 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-Misdeméanor Pending Extradition ☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Date Filed** Docket Number OTN/LiveScan Number Complaint/Incident Number Services? ☐ YES ☐ NO 09/22/2020 OCC-20-0023 GENDER ров 9/12/1987 POB Co-Defendant(s) \boxtimes Add'l DOB □ Male First Name Middle Name Last Name Gen Female AKA RACE Asian Black Native American Unknown ETHNICITY Hispanic Unknown ■ Non-Hispanic GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WH! (White) XXX (Unk./Baid) GRN (Green) PNK (Pink) Color □ BLN (Blonde / Strawberry) BLK (Black) ☐ BLU (Blue) GRY (Gray) BRO (Brown) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) DNA **DNA Location** ☐ YES ☐ NO WEIGHT (lbs.) **FBI Number MNU Number** Defendant Fingerprinted ☐ YES ⊠ NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Registration Comm'i Veh. School Veh. Oth. NCIC Veh. Code Reg. mat Ind. Plate # П same Sticker (MM/YY) 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. See Pa.R.Crim.P. 507). HEATHER CASTELLINO 09/22/2020 (Name of the attorney for the Commonwealth) (Date) 590 KATHRYN GRADY (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General 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 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 (Place-Political Subdivision) in DAUPHIN County [22] on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020 (County Code)

OPC 412A - Rev. 7/18

	Date Filed:	OTN/LiveS	can Number	······		mplaint/incide	
	First:	Middle:		Las		C-20-0023	<u> </u>
Defendant Name:	WENDY	R			ı. NFOR	Α	
######################################							
The acts committed by the when there is more than Set forth a brief summary of the vithout more, is not sufficient the age of the victim at the tine is listed. If the identity of an a	n one offense, each the facts sufficient to a . In a summary case, y ne of the offense may b	ch offense should be advise the defendant of the you must cite the specific to be included if known. In ac	numbered che nature of the of section(s) and settled to section(s) and settled to section, sections.	ronologica fense(s) charbsection(s) curity numb	ally. arged. A of the s ers and	citation to the si statute(s) or ordir i financial inform	tatute(s) allegedly vio nance(s) allegedly vio
nchoate	☐ Solicitation 18 902 A	on Conspiracy 18 903		Nu	mber o	f Victims Age 60	or Older
□ 911	B3	of the 18 PA (C.S.A. 1	F1			
ead? Offense Secti	ion Subsection	n PA Statu	ite (Title) Co	unts (Grade	NCIC Offense Code	UCR/NIBRS Cod
PennDOT Data (if applicable)	cident Number		☐ Inters	tate		Safety Zone	□ Work Zor
tatute Description (inclu	de the name of st	atute or ordinance): o	ORRUPT ORGA	NIZATIO	ıs		
choate	☐ Solicitation			Num	ber of \	/ictims Age 60 c	or Older
ffense 18 901 A	18 902 A	18 903					
	אם	of the 18 PA C	S.A. 1	F1			
2 911	B4		<u> </u>			11010	بجعائب خطيعا فيعالب
d? Offense# Section	<u></u>	PA Statute	(Title) Cour	nts Gra	ıde	NCIC Offense Code	UCR/NIBRS Code
d? Offense# Section PennDOT Data (if applicable)	n Subsection	PA Statute	☐ Intersta	te	s		UCR/NIBRS Code
PennDOT Data (if applicable) atute Description (includes of the accused assocuphin, Schuykll, and York Courupt (includes of the crime of Corrupt (includes of the crime of the crime of Corrupt (includes of the crime of the cr	dent Number le the name of stated with this Offeinty, Pennsyvlania and Organizations, that is, pt Organizations, did of conduct or participate,	tute or ordinance): Co	Interstate ORRUPT ORGAN ent, did between lolate the provision forth herein, De arkal Munford an the conduct of the	May of 202 ons of Sections of Section fendant, with dother individuals of the section of the sec	O and Son 911(In the inviduals, ne enter	Code Safety Zone eptember of 2020 b)(3) of the Crimitent of promoting while employed or prise through a prise	Work Zone 0, within the County of the Code, 18 Pa.C.S. gor facilitating the or associated with the
PennDOT Data (if applicable) atute Description (included to the accused association of the accused association of the crime of corruption of corruption of crime of corruption of crime	dent Number le the name of stated with this Offeinty, Pennsyvlania and Organizations, that is, pt Organizations, did of conduct or participate,	tute or ordinance): Co ense: In that the Defenda elsewhere, conspired to vi, during the periods as set conspire and agree with Ma, directly or indirectly, in the f Section 911(b)(4) of the	Interstate of the conduct of the conduct of the conduct of the Crimes Codes, 11	May of 202 ons of Section fendant, with distribution of the affairs of the B Pa.C.S.A.	O and Son 911(In the inviduals, ne enter	Code Safety Zone eptember of 2020 b)(3) of the Crimitent of promoting while employed or prise through a prise	Work Zone 0, within the County of the count
PennDOT Data (if applicable) atute Description (included to soft the accused association), pertaining to Corrupt amission of the crime of Corrupt amission of the cri	dent Number le the name of stationary, Pennsyvlania and Organizations, that is, pt Organizations, did conduct or participate, \$911(h), in violation of 18 902 A	tute or ordinance): Co	Intersta ORRUPT ORGAN ent, did between lolate the provisit forth herein, De arkal Munford an ne conduct of the Crimes Codes, 11	May of 202 ons of Section fendant, with digital other indices affairs of the B Pa.C.S.A. §	O and Son 911(In the inviduals, ne enter	Code Safety Zone eptember of 2020 b)(3) of the Crimitent of promoting while employed or prise through a p (4).	Work Zone 0, within the County of the count
PennDOT Data (if applicable) atute Description (included at the Descripti	iated with this Offernty, Pennsyvlania and Organizations, that is, pt Organizations, did conduct or participate, \$911(h), in violation of \$18,902 A\$ A Subsection	tute or ordinance): Co	Intersta ORRUPT ORGAT ent, did between folate the provision forth herein, De arkal Munford an ne conduct of the Crimes Codes, 10 Num S.A. 1	May of 202 ons of Section fendant, with dother indiversifiers of the Brack.S.A.	O and Son 911(In the inviduals, ne enter 911(b)	Code Safety Zone eptember of 2020 b)(3) of the Crimitent of promoting while employed or prise through a p (4).	O, within the County of es Code, 18 Pa.C.S. g or facilitating the or associated with the pattern of racketeering
PennDOT Data (if applicable) atute Description (included to the accused assocuphin, Schuykll, and York Couphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin, and York Couphin, and York Couphin, and York Couphin, and York	dent Number le the name of star lated with this Offernty, Pennsyvlania and Organizations, that is, pt Organizations, did of conduct or participate, \$911(h), in violation of 18 902 A A Den Subsection Coldent	tute or ordinance): Coense: In that the Defendate elsewhere, conspired to via, during the periods as set conspire and agree with Mark, directly or Indirectly, in the Section 911(b)(4) of the Conspiracy 18 903	Intersta ORRUPT ORGAN ant, did between lolate the provision forth herein, De arkal Munford an ne conduct of the Crimes Codes, 11 Num S.A. 1	May of 202 ons of Section fendant, with dother individual affairs of the section	O and Sign 911(In the inviduals, ne enter 1911(b).	Code Safety Zone	□ Work Zone 0, within the County of the co
PennDOT Data (if applicable) atute Description (included at the Descriptio	dent Number le the name of star lated with this Offernty, Pennsyvlania and Organizations, that is, pt Organizations, did of conduct or participate, \$911(h), in violation of 18 902 A A Den Subsection Subsection Cocident	tute or ordinance): Compared to video and agree with Marketily or indirectly, in the Section 911(b)(4) of the Compared to Section 911(b)(4) of the PA Statute	Intersta ORRUPT ORGAT ant, did between folate the provision forth herein, De arkal Munford an the conduct of the Crimes Codes, 16 Num S.A. 1 (Title) Coun Interst	May of 202 ons of Section fendant, with d other individe affairs of the B Pa.C.S.A. §	O and Son 911(In the in viduals, ne enter 6911(b)	Code Safety Zone Safety Zone September of 2020 (b)(3) of the Crimitent of promoting while employed of prise through a prise th	O, within the County of the Co
PennDOT Data (if applicable) atute Description (included to the accused assocuphin, Schuykll, and York Couphin, Schuykll, and York Couphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin (included to the accused assocuphin, Schuykll, and York Couphin,	dent Number le the name of star lated with this Offernty, Pennsyvlania and Organizations, that is, pt Organizations, did of conduct or participate, \$911(h), in violation of 18 902 A A Den Subsection Subsection Cocident	tute or ordinance): Compared to video and agree with Marketily or indirectly, in the Section 911(b)(4) of the Compared to Section 911(b)(4) of the PA Statute	Intersta ORRUPT ORGAT ant, did between folate the provision forth herein, De arkal Munford an the conduct of the Crimes Codes, 16 Num S.A. 1 (Title) Coun Interst	May of 202 ons of Section fendant, with d other individe affairs of the B Pa.C.S.A. §	O and Son 911(In the in viduals, ne enter 6911(b)	Code Safety Zone Safety Zone September of 2020 (b)(3) of the Crimitent of promoting while employed of prise through a prise th	O, within the County of the Co

	CE CRIA	AINIAI C	NINIT
COLI	JE CRIN	MINAL	411W 1

Docket Num	ber:	Date File	d:	OTN/LiveSc	an Numbe	r	Complaint/incident Number OCC-20-0023					
Defendant N	ame:	First: WENDY		Middle: R	-							
Inchoate Offense	☐ Attempt 18 901 A		iolicitation 8 902 A	☑ Conspiracy		Number	r of Victims	Age 60 or Olde	r			
□ 4	3921		20	of the 18 PA C	Andrew State State	1	F1					
Lead? Offen PennDOT (if applic	Data able)	Accident Number	Subsection	PA Statute		Counts nterstate		NCIC Offense Safety Zone		Work Zone		
Theft By Unlawfu conduct which co to commit such o Defendant did ag violation of Title	Il Taking Or Di postitutes a cri pime, that is, I pree with other 18, and in purs	sposition, Title me or did agre between May o Individuals the suance of such	: 18 Section 39 te to aid such of 1 2020 and Sep at they, or one 1 conspiracy on	e: The Defendant did, 21(a), did agree with other person or persor ptember of 2020, with or more of them, wo e or more overt acts walsely filed applications	one or more ns in the plan in the Coun uld engage i were commi	e other per nning or co ty of Daup in conduct tted, in viol	sons that the ommission o hin, Schuyki constituting lation of Sec	ey or one or mo f such crime or o ill and York, Peni the crime of the tion 903 of the	re of them voor an attemp nsylvania and oft by unlawf Crimes Code	vould engage t or solicitation d elsewhere, ul taking, in , 18 Pa.C.S.		
Inchoate Offense	☐ Attempt 18 901 A		olicitation 3 902 A	Conspiracy 18 903		Number	of Victims	Age 60 or Olde				
□ 5	3922			of the 18 PA C.		1	F1					
Lead? Offens PennDOT (if applica	Data	Accident Number	Subsection	PA Statute		Counts nterstate	Grade	NCIC Offense Safety Zone		R/NIBRS Cod Work Zone		
erson deceives if eception as to a _l /endy Danfora, M nd Industry webs	he intentional person's intent arkal Munford ite for themse	ly creates or re ion to perform , and others fa lves and other	einforces a falso a promise sha Isely filed appli individuals, alt	In that the Defendan e impression, inlouding if not be inferred from ications for the Pande hough they did not qu at filings totaled appro	g faise impro the fact alo mic Unempl ualify for the	essions as one that he oyment As benefits.	to law, value did not sub sistance pro	e, intention or ot esequently prefor gram through th	ther state of rm the prom te PA Depart	mind; but ise. To Wit: ment of Labo		
nchoate C	Attempt 18 901 A	☐ Soli 18 9	citation 02 A	☑ Conspiracy 18 903	\	lumber of	Victims Ag	e 60 or Older				
□ [6	3922	A2		40 0.0.		<u> </u>	1			!		
ead? Offense# PennDOT Da (if applicable)	Comment of the Control of the Contro	n Su ccident umber —	bsection	PA Statute (Ti	tle) Co	ounts rstate	1	NCIC Offense Co Safety Zone		NIBRS Code ork Zone		
atute Descrip ts of the accurson deceives if he teption as to a periody Danfora, Ma	tion (include ised associal e intentionally erson's intentional rkal Munford a	ated with the creates or religion to perform a and others false	is Offense: I nforces a false a promise shall ely filed applica	ordinance): THEF In that the Defendant Impression, inleuding not be inferred from t Itions for the Pandemi uals, although they did	did intention false impres the fact alon c Unemploy	nally obtain ssions as to ne that he o ment Assis	law, value, did not subs tance benef	intention or oth equentiy preform it program throu	er state of m the promis igh the PA D	nind; but e. To Wit: epartment		

ODC 4134 Dev. 7/1

Docke	t Numb	er:		Da	Date Filed: OTN/LiveScan Number									POLICE CRIMINAL COMPLAIN Complaint/Incident Number OCC-20-0023						
Defen	dant Na	me:		First: WEN					Middle:					Las			7020			
Inch	oate !	□ At	tempi		1 🗖	Solicitație	on.	M	Conspiracy		7	ĺ	Alumb		. Vietim	Ago Si	0 or Olde			
Offe	Strategister COSS Services		901 A		. —	18 902 A			18 903				NUMB	ero	AICTITIE	Age or	or Oldi	#I		
	7		3925				FEET	Ellie			district on	2	athle Chair	l	-1					
49-14-1	Offens nnDOT applica	Data		Section Accid Num	A STATE OF THE STA	Subsection	on		PA Statu	ite (Ti			Counts terstate		Grade		C Offense ty Zone	Code	UCR/NIBRS Co	
disposes or dispos penefits ;	of movab ed with in program t	le prop Itent to hrougi	pert of presto n the f	anothe re it to ennsylv	r know the ow /ania Li	ing that it ner. To W abor and I	: has be /it: Wer Industry	en sto idy Da webs	olen, or believ	ing the Mun If and	nat it ford, mui	has and tiple	probab others other in	ly be false idivid	en stole ly filed f	n, unless or Pand	s the pro emic Une	perty is employ	eceives, retains, or s received, retaine ment Assistance lify for the	
Inchoa	ite	Atter	npt		□ So	licitation		□ Co	onspiracy			N	umber	of V	ctims A	ae 60 o	r Older			
Offens		18 90			18	902 A			903				-11,50	-						
	8	41				(1)(iii)	of t	10	18 PA C.	_i		2		F2						
	Offense# nDOT Da pplicabl		17.1	ion Accider Numbe	ı	Subsection			PA Statute	(Title)		nters	unts state	G	rade 🗀	Safety 2	Offense Co Zone	ode	UCR/NIBRS Code Work Zone	
tatute	Descrip	tion (inclu	de the	name	of statu	ute or	ordir	nance): ACC	CESS	DEV	ICE	FRAUI)						
ccess dev	vice to ob To Wit; V or the pur	tain or Vendy pose o	in an Danfo f rece	attempt ra, Mari	to obt	ain proper	rty or se others ts. The	ervice: knew debit	s with knowle the Pandemi t card was se card was se	dge f c Une	or ar	ny oti pyrne activa	ner reas nt Assis ated by	son h stanc Dan	nis use o e benefi fora, not	the acc s would the app	ess devi	ce has on a d	cation, used an been revoked or ebit card issued b	
Offens	e	18 90	1 A		18	902 A		18	903											
	9 Offense#	41	06 Sec	ion	A	2 subsection	of t	18	18 PA C.S			2	ints	F2	rade	NCICO	Offense Co	nda	UCR/NIBRS Code	
if ar	DOT Da oplicable)		Acciden Numbe	t :							nters	tate			Safety 2		7	☐ Work Zone	
ts of th kes, sells ess devices	e accus s, gives, o ce is coun	sed as r other terfeit, ne issu	ssoci wise t altere	ated w ransfer ed or inc he devi	rith th to anot complet ce hold	is Offens ther, or of te, belongs ter. To Wi	se: To fers or s to and it: Wen	that t adver other	tises, or aids	t did o and a as no Muni	on or bets t aut	abo any thoriz	ut the a other p ed its u	erso Ise, I knew	n to use has been of the Par	an acce revoked demic U	ss device d or cano Jnemploy	knowi celed or ment /	r for any reason Assistance	

Dock	et Num	ber:	Date /	Filed:		OTN/LiveScan Number						Complaint/Incident Number OCC-20-0023					
Defer	idant N	ame:	First: WEND	Υ		Middle R):			Last: DANFORA							
Inchd Offe		☐ Attempt 18 901 A		☐ Solicitation	on	☐ Conspirac	у		Numbe	er of V	ictims	Age 60 or Olde	er				
	10	4106		A3	TOTA	ine 18 PA	C.S.A.	2		(F)3							
Lead?	Offens	se# Se	ction	Subsection		2022000	atute (Title)		Counts		rade	NCIC Offense	Code	UCR/NIBRS Code			
1000 Sept. 100 S	nnDOT applica	STATE OF STA	Acciden Number	26.9.254				☐ In	terstate			Safety Zone		☐ Work Zone			
Statute	Descri	ption (inclu	de the n	ame of sta	tute or	ordinance):	ACCESS I	EVIC	E FRAU	D							
access de Markai Mi	vice kno unford, a	wing that it is nd others kne	counterfe w the Pan	it, altered, inc demic Unemp	complete o doyment	or belongs to a	nother per efits would	son w	ho has r	ot aut	horized	its possession.	To Wit	ocation, possess an :: Wendy Danfora, purpose of receiving			
Inchos	(a) (I)	☐ Attempt		Solicitation	, ! -	☐ Conspiracy		Г	\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.	-5\/:-	.47 A	50 01					
Offens		18 901 A		18 902 A		18 903			Number	Of VIC	tims A	ge 60 or Older					
	11	7512		Α	of th			2		F3							
Lead? Peni	Offense nDOT D		ion Accident	Subsection		PA State	ute (Title)		ounts	Gra		NCIC Offense	Code	UCR/NIBRS Code			
	pplicab		Number	me of state	ito or o	rdinance): c			rstate	BAT IN		Safety Zone		☐ Work Zone			
Statute	Jeschp	tion (includi	e me na	me or statt	ire oi oi	dinance). C	KIMINAL	USE	DF COM	MÓN	CATIC	N FACILIT					
or the atter Substance Corrections	mpt there Drug, De SCI Mal	eof of any crim vice and Cosm nanoy telephor	ne which o netic Act. ne commu	constitutes a f To Wit: Wend incations and	elony und dy Danfor e-mall sy	der this title or a and Markal N stems, which p	under the Munford ut provided th	act of ilibzed e pers	April 14, electror onal ide	, 1972 nic com ntificat	(P.L.23 munication info	33, No.64), know ations through t	wn as th he Depa rkal Mui	artment of nford and 6 other			
Inchoa Offens		Attempt		Solicitation	Ē	Conspiracy		ľ	lumber	of Vic	tims A	ge 60 or Older					
	12	4911		A1	of th	■ 18 PA.0		1		M2			. T				
Lead?	Offense	# Sect		Subsection		2020	ite (Title)		ounts	Gra	de	NCIC Offense C	ode	UCR/NIBRS Code			
	DOT D		Accident Number				[] inte	rstate			Safety Zone		☐ Work Zone			
		75	200	ne of statut	e or ord	linance): TAI	MPERING	WIT	H PUBL	IC RE	CORDS	3					
ocument or overnment	r thing be ; To Wit: of Labor	elgoning to, or Wendy Danfo website. Danf	received ra filed 20	or kept by, th) false Pander	e governi nic Unem	ment for inform ployment Assis	nation or re tance bene	cord,	or requi	red by oplicati	law to ons for	or fiase alteration be kept by othe herself and othe th weekly re-cel	ers for in ners thro	nformation of the ough the PA			

				OFICE CKIMINAL				
Docket Number:	Date Filed:	OTN/LiveScan	Number	Complaint/Incident Number				
Defendant Name:	First:	Middle:	1	ast:	A. C. Barrell Markett Barrell			
	WENDY	R	l D	ANFORA				
Inchoate	t	n 📗 Conspiracy	Number	of Victims Age 60 or Older	•			
Offense 18 901 A	_	18 903	Namber	T VIOLING AGE OF GIGET				
□ 13 4904	the state of the s	of the 18 PA.C.S.		M3	HODANIO CAL			
PennDOT Data	Section Subsection Accident	n PA Statute (T	itle) Counts Interstate	Grade NCIC Offense Cod ☐ Safety Zone	e UCR/NIBRS Code ☐ Work Zone			
(if applicable) Statute Description (inc	Number ——— lude the name of sta	atute or ordinance): UNS	WORN FALSIFICAT					
,								
or pursuant to a form bearing	notice, authorized by lav	v, to the effect that false state	ements made therein	se staement which they do not are punishable. To Wit: Wend emic Unemployment Assistance	y Danfora, Markai			
Inchoate Attempt Offense 18 901 A		n Conspiracy	Number o	of Victims Age 60 or Older				
		of the						
Lead? Offense# S PennDOT Data	Section Subsection Accident	PA Statute (Ti		Grade NCIC Offense Code	UCR/NIBRS Code			
(if applicable)	Number ——		☐ Interstate	☐ Safety Zone	☐ Work Zone			
Statute Description (inclu	ude the name of stat	ute or ordinance):			•			
Acts of the accused asso	ociated with this Offe	nse:						
·	**							
			I					
Inchoate	Solicitation 18 902 A	Conspiracy 18 903	Number of V	/ictims Age 60 or Older				
Lead? Offense# Sect	lion Subsection	of the PA Statute (Title)	Counts	Grade NCIC Offense Code	UCR/NIBRS Code			
PennDOT Data	Accident Number ———	TA Statute (Title)	☐ Interstate	☐ Safety Zone	☐ Work Zone			
Statute Description (include	de the name of statu	te or ordinance):						
Acts of the accused associ	ciated with this Offen	se:						



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	09/22/2020		OCC-20-0023
	First:	Middle:	Last:
Defendant Name:	WENDY	R	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 COMPLAIN
Docket Number:	Control Filed:	TN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: WENDY	Middle:	Last: DANFORA
I ask that a warra made.	int of arrest or a summons be	issued and that the defend	ant be required to answer the charges I have
belief. This verific			pest of my knowledge or information and the Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	nsists of the preceding page(s	s) numbered <u>1</u> through	
	Ivania that require filing confid		ablic Access Policy of the Unified Judicial Iments differently that non-confidential
of Pennsylvania and	were contrary to the Act(s) of arrest can be issued, an af	the Assembly, or in violation	peace and dignity of the Commonwealth on of the statutes cited. must be completed, sworn to before the
			& Krady
(Date)	(Year)		(Signature of Affiant)
AND NOW, on this date	· <u>912112020</u>	l certify that the com	plaint has been properly completed and verified.
An affidavit of probable	cause must be completed before	a warrant can be issued.	
(Magisterial District Con	urt Number)	(Issuing Authority)	COURT PHILIP
			Manifegiora.

POLICE CRIMINAL COMPLAINT

Docket Number:	Q 71/70 \)9158	TN/LiveScan Number	Complaint/Incident Number OCC-20-0023
0.00	First:	Middle:	Last:
Defendant Name:	WENDY	R	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



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

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.



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

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 COMMUNCIATIONS

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

Budied .				
QEO.	DOLICE	CRIMINAL		AINIT
A CARLON	LOTICE	CKININAT	COMIL	

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

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.

	POL	ICE	CRIMINAL	COMPL	AINT
Section 1	·	.,			, TI / I

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

- 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



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

In one communication, post marked June 24, 2020, Munford directs Danfora to "adjust the weeks or make it seem as the 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.

NA.	POLIC	E CRIMINAL	COMPL	AINT
A STATE OF THE PARTY.	FULIU		COMPLE	771171

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

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.



Docket Number:	Date Filed: O		TN/LiveScan Number			Complaint/Incident Number OCC-20-0023	
	First:		Middle:		Last:		
Defendant Name:	WENDY	1	R		DAN	FORA	

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



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

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



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

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	<u>Lgrimes887@gmail.com</u>	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	Shayiyn 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	COMPL	AINT
di campionis.				

Docket Number:	Date Filed: / /	, 0	TN/LiveScan Number	Complaint/Incident Number OCC-20-0023
	First:		Middle:	Last:
Defendant Name:	WENDY		R	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.

松	POLICE	CRIMINAL	COMPL	AINT
Section 1			OOM: L	, ,,,,

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



Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/incident Number OCC-20-0023
entranta de la composição	First:	Middle:	Last;
Defendant Name:	WENDY	R	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,



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
			OCC-20-0023
	First:	Middle:	Last:
Defendant Name:	WENDY	R	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

POLICE CRIMINAL COMPLAIN

		PULICE CRIMINAL COMPLAIN
Docket Number: OL-201-2070 C 21/70 UC15	OTN/LiveScan Numb	per Complaint/Incident Number OCC-20-0023
Defendant Name: First: WENDY	Middle: R	Last: DANFORA
		Ashady
		(Signature of Affiant)
Sworn to me and subscribed before me this	day of	September 2020
9-22-20 Date	1100	, Magisterial Die Harris (1996)
My commission expires first Monday of January,	2422	STANDARD TO STAND THE STANDARD TO STANDARD
, commission expired medially creamally,		
		REAL PROPERTY OF THE PROPERTY
		OF DAUPHILITIE

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-3-04 VS. MDJ: Hon. Dominic A. Pelino DEFENDANT: (NAME and ADDRESS): Address: 576 East Main Street JOSEPH **KLECHA** First Name Middle Name Hummelstown, PA 17036 Ge SCI Benner Township, 301 Institution Drive, Telephone: (717)583-1912 Bellefonte, PA 16823 **NCIC Extradition Code Type** ☐ 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 Request Lab Decket Number Date Filed OTN/LiveScan Number Complaint/Incident Number Services? ☐ YES ☒ NO OCC-20-0020 GENDER ров 05/05/1986 ров Ра Co-Defendant(s) Add'I DOB Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ✓ White Asian Black ■ Native American Unknown ETHNICITY Hispanic Non-Hispanic ☐ Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) ☐ BLU (Blue) BRO (Brown) ☐ PLE (Purple) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color ☐ BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) DNA NO NO **DNA Location** ☐ YES WEIGHT (lbs.) FBI Number **MNU Number** 195 **Defendant Fingerprinted** ☐ YES **⊠** NO Ft. HEIGHT In. **Fingerprint Classification:** 11 DEFENDANT VEHICLE INFORMATION State Oth, NCIC Veh, Code Haz Registration Comm'l Veh. School Veh. Reg. mat Ind. same Plate # Sticker (MM/YY) as Def. VIN 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 09/22/2020 (Name of the attorney for the Commonwealth) (Date) SPECIAL AGENT CHRISTOPHER WEAVER **BADGE #603** (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # PA0222400 Pennsylvania Office of Attorney General (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, (Place-Political Subdivision) (Subdivision Code) 651 Boas St, Harrisburg, Pa in DAUPHIN County [22] on or about MARCH 12, 2020 TO AUGUST 31, 2020 (County Code)

POLICE CRIMINAL COMPLAINT Pate Filed: Docket Norgber QTN/LiveScan Number Complaint/Incident Number OCC-20-0020 First: Middle: Last: Defendant Name: JOSEPH E **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 ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older _ 18 901 A 18 902 A 18 903 Offense 1 図 3921 of the TITLE 18 1 F2 a Offense **NCIC Offense** Lead? Section Subsection PA Statute (Title) Counts Grade UCR/NIBRS Code Code PennDOT Data **Accident Number** ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) 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 ☐ Attempt ☐ Solicitation Number of Victims Age 60 or Older _ 18 901 A 18 902 A 18 903 Offense 2 of the 1 3921 TITLE 18 F2 a NCIC Offense Offense# PA Statute (Title) Lead? Section Subsection Counts Grade UCR/NIBRS Code Code PennDOT Data **Accident Number** ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) 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. 5903 Inchoate ☐ Solicitation ☐ Attempt ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 3 of the 3922 TITLE 18 1 F3 a 3 PA Statute (Title) Lead? Offense# Section Subsection Counts Grade **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) 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

AOPC 412A - Rev. 7/18

influencing another to whom he stands in a fiduciary or confidential relationship.

POLICE CRIMINAL COMPLAINT Docket/Number Date Filed: QTN/LiveScan Number Complaint/Incident Number OCC-20-0020 First: Middle: Last: Defendant Name: E JOSEPH **KLECHA** inchoate ☐ Attempt ☐ Solicitation □ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 903 Offense 18 902 A 4 3922 a 3 of the TITLE 18 1 F3 Lead? Offense# Subsection PA Statute (Title) Counts Grade **NCIC Offense Code** UCR/NIBRS Code Section PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number 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 ☐ Attempt ☐ Solicitation □ Conspiracy Number of Victims Age 60 or Older 18 901 A 18 902 A 18 903 Offense 5 of the TITLE 18 3925 a F3 PA Statute (Title) Lead? Offense# Section Subsection Counts Grade **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone Number (if applicable) 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.

Offense# Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Compensation (if applicable) Number Interstate Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:	Incho Offen		empt 01 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903	Number	of Victims	Age 60 or Older	·
PennDOT Data Accident Interstate Safety Zone Work Zone Statute Description (include the name of statute or ordinance):					A PROPERTY OF THE PARTY OF THE			·	-
(if applicable) Number Li Interstate Li Safety Zone Li Work Zone Vork Zone Li Work Zone Li Safety Zone Li Work Zone Li Safety Zone Li S			Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
				25/50/26/31		☐ Interstate	1	☐ Safety Zone	☐ Work Zone
, total of the mountain man and man and an	Acts of	the accused	associated	with this Offen	se:				



			POLICE CRIMINAL COMPLAINT
Docket Numbers	Date Filed:	ATN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: JOSEPH	Middle: E	Last: KLECHA
2. I ask that a wa made.	rrant of arrest or a s	ummons be issued and that the defend	dant be required to answer the charges I have
3. I verify that the	facts set forth in this	s 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 $\underline{1}$ through $\underline{29}$
- 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 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 affidayit of probable cause must be completed, sworn to before the issuing authority, and attached.) SEPTEMBER 22 2020 (Year) (Date) I certify that the complaint has been properly completed and verified. AND NOW, on this date An affidavit of probable cause must be completed before a warrant can be issued. (Magisterial District Court Number) (Issuing Author

POLICE CRIMINAL COMPLAINT

Docket Number: Date Filed: OTN/LiveScan Number OCC-20-0020

Defendant Name: Docket Number OCC-20-0020

First: JOSEPH E 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



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



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

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



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

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, Watsontown, 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 Watsontown, 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



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

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



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

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



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

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.



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

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



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

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.



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

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.



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

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 prepaid 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



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

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, Watsontown, 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.



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

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



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

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.



Docket Number: 30	Pate Filed:	UG 1599 Y	Complaint/Incident Number OCC-20-0020
Defendant Name:	First:	Middle:	Last:
	JOSEPH	E	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

day of

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

Magisterial District Judge

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: 12-3-04 VS. MDJ: Hon. Dominic A. Pelino (NAME and ADDRESS): Address: 576 East Main Street MICHAEL LYTER Middle Name First Name Ge Hummelstown, PA 17036 SCI Benner Township, 301 Institution Drive, Bellefonte, PA 16823 Telephone: (717)583-1912 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 ☐ B-Misdemeanor Limited 4-Felony No Extradition ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Docket Number Date Filed** OTN/LiveScan Number Complaint/Incident Number Services? ☐ YES **⊠** NO OCC-20-0020 GENDER ров 09/19/1980 POB NO Co-Defendant(s) \times Add'l DOB **⊠** Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE ☑ White ☐ Asian ☐ Black ■ Native American Unknown Hispanic ETHNICITY Non-Hispanic Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) Hair BLK (Black) ☐ WHI (White) ONG (Orange) XXX (Unk./Bald) GRN (Green) PNK (Pink) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) MUL (Multicolored) DNA **DNA Location** ☐ YES NO IX WEIGHT (lbs.) FBI Number **MNU Number** 235 **Defendant Fingerprinted** ☐ YES ☒ NO Ft. HEIGHT In. Fingerprint Classification: 1 6 **DEFENDANT VEHICLE INFORMATION** Comm'l Veh. Haz Registration School Veh. Oth, NCIC Veh. Code Reg. Ind. mat Plate # same Sticker (MM/YY) 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. See Pa.R.Crim.P. 507). HEATHER A. CASTELLINO, SDAG 09/22/2020 (Name of the attorney for the Commonwealth) SPECIAL AGENT CHRISTOPHER WEAVER **BADGE #603** (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # 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, (Subdivision Code) (Place-Political Subdivision) 651 Boas St, Harrisburg, Pa in DAUPHIN County [22] on or about MARCH 12, 2020 TO AUGUST 31, 2020 (County Code)

Dock									A CONTRACTOR OF THE PARTY OF TH	OLIGE	- 01 (1111111111111111111111111111111111	L COMPLAII
JUCK	et Nu	mbe	r:	Date	e Filed:	0	TN/LiveSc	an Nun		Co	mplaint/Incident	
Defer	idant	Nam	e:	First:	First: Middle: C				Last: LYTER			
			196	THICK	IALL		0			LIILK		*
Wher Set fo vithou he ag	ther orth a b t more e of th	e is rief s e, is no e vict	more t ummary ot suffic im at th	han one of of the facts ient. In a su a time of the	offense, ea s sufficient to immary case, e offense may	ch offense sh advise the defer you must cite th	nould be need and and of the less than the specific seconds.	umber nature o ection(s) lition, so	ed chronol f the offense and subsect ocial security	ogically. (s) charged. A ion(s) of the numbers an	A citation to the stat statute(s) or ordinar d financial informati	ated, if appropriat ute(s) allegedly violate nce(s) allegedly violate on (e.g. PINs) should
ncho Offer			Attempt 18 901 A		Solicitat		onspiracy 8 903			Number	of Victims Age 60 o	r Older
\boxtimes	1		3921		а	a June E	TITLE 1	8	1	F2		
ead?		ense #		Section	Subsection	on	PA Statute	e (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nnDO appli			Accident N	Number				Interstate		Safety Zone	☐ Work Zone
atut	e De	scrip	tion (ir	clude the	e name of s	statute or ordi	nance): Ti	IEFT BY	UNLAWFU	L TAKING C	R DISPOSITION	
cho	ate		Homnt		☐ Solicitati		onspiracy			M	Vistime Age 50 or	014
- r			901 A		18 902 A		903				Victims Age 60 or	Older
] [2 Offens	18	3921	ection	a Subsection	of the	903 TITLE 18		1 Counts	F2	NCIC Offense	
d?	2 Offens	18 se# C Dat	3921 s	ection Accident N	a Subsection	of the	903	(Title)	Counts	F2 Grade	NCIC Offense Code	UCR/NIBRS Code
ad? Pen	2 Offens	se#	3921 s	Accident N	a Subsection umber	of the	903 TITLE 18 PA Statute	(Title)	Counts	F2 Grade	NCIC Offense	
Pen (if a atute ats of eft by conducitation fendar ation	Offens applice Des the a Unlaw ct which	F Date able accurrent ful Tach commit agree	3921 s a) ion (included as sking or stitutes t such or with other as sking or	Accident N clude the sociated Disposition, a crime or rime, that is her individu	subsection umber name of si with this O , Title 18, Sec did agree to a s, between Ju als that they,	of the nature or ordinate ordinat	PA Statute nance): CR fendant did, l agree with erson or pers September of	(Title) IMINAL with the one or nons in the f 2020, wild engage	Counts Interstate CONSPIRA Intent of proper other period of the planning of th	Grade Grade Omoting or faursons that the r commission unty of Daup	NCIC Offense Code Safety Zone cilitating the commisey or one or more of of such crime or of hin, Centre, Pennsyl the crime of theft b	UCR/NIBRS Code Work Zone Ssion of the crime of them would engage
Pen (if a atute ts of eft by conducitation end ation is.)	Offension DOT applice Des Unlaw ct which on to cont did of Title	18 Part able accurrent full Tach coromminagree e 18,	3921 s a) ion (included as sking or stitutes t such or with other as sking or	Accident No clude the associated Disposition, a crime or rime, that is ner individual sursuance of the control	subsection umber name of si with this O , Title 18, Sec did agree to a s, between Ju als that they,	of the nature or ordinate tatute ordinate ordinate tatute ordinate tatute ordinate ordinate ordinate ordinate ordinate ordinate ordinate ordinate ordin	PA Statute nance): CR fendant did, l agree with erson or pers September of	(Title) IMINAL with the one or nons in the f 2020, wild engage	Counts Interstate CONSPIRA Intent of properties of the planning of the plannin	Grade Grade Omoting or faursons that the commission unty of Daupit constituting plation of Section 1.5 constituting plation of Section 1.5 constituting plation 1.5 constituting 1.5 con	NCIC Offense Code Safety Zone cilitating the commisey or one or more of of such crime or of hin, Centre, Pennsyl the crime of theft b	UCR/NIBRS Code Work Zone Ssion of the crime of f them would engage an attempt or vania and elsewhere, y unlawful taking, in
Pen (if a atute ts of ts	Offense Des The a Unlaw ct which on to cont did of Title ate se	T Date cable coript account ful Tach comming agree e 18,	3921 s a) ion (incomplete as a sking or stitutes to such or with other and in part of the second and in part of the secon	Accident Noclude the sociated Disposition, a crime or rime, that is ner individuoursuance of A	subsection umber name of si with this O , Title 18, Sec did agree to a s, between Ju als that they, f such conspir	of the nature or ordinate o	PA Statute PA Statute nance): CR fendant did, l agree with erson or pers September of them, wote overt acts w	(Title) IMINAL with the one or n ons in the f 2020, wild engage were communications.	Counts Interstate CONSPIRA intent of property of the planning	Grade Gr	NCIC Offense Code Safety Zone cilitating the commisey or one or more of of such crime or of hin, Centre, Pennsyl the crime of theft bition 903 of the Crim Age 60 or Older	UCR/NIBRS Code Work Zone Ssion of the crime of f them would engage an attempt or vania and elsewhere, y unlawful taking, in les Code, 18 Pa.C.S.
Pen (if a atute ts of end atute end end end end end end end end end en	Offense Des The a Unlaw ct which on to cont did of Title ate se	T Dat able accurrent accurrent accurrent accurrent accurrent agree e 18,	3921 s a) ion (inexpectation) sed as aking or estitutes to such or with other and in part of the second se	Accident N clude the sociated Disposition, a crime or rime, that is ner individu sursuance o	subsection umber name of si with this O , Title 18, Sec did agree to a s, between Ju als that they, f such conspir	of the nature or ordinate o	PA Statute PA Statute nance): CR fendant did, lagree with erson or pers September of them, wote overt acts w	(Title) IMINAL with the one or n ons in the factor of th	Counts Interstate CONSPIRA Intent of properties of the planning of the plannin	Grade F3 Grade	NCIC Offense Code Safety Zone cilitating the commisey or one or more of of such crime or of hin, Centre, Pennsyl the crime of theft betion 903 of the Crime Age 60 or Older	UCR/NIBRS Code Work Zone Ssion of the crime of f them would engage an attempt or vania and elsewhere, y unlawful taking, in the code, 18 Pa.C.S.
Pen (if a ation 3.	Offense Des The a Unlaw ct which to cont did of Title ate se	T Date cable cript accurrent agree e 18,	3921 sa a) ion (included as a sking or nestitutes to such a country with other and in particular and	Accident Noclude the sociated Disposition, a crime or rime, that is her individuoursuance of Accider Numbe	subsection umber name of si with this O , Title 18, Sec did agree to a s, between Ju als that they, f such conspir	of the nature or ordinate o	PA Statute PA Statute nance): CR fendant did, l agree with erson or pers September of them, wote overt acts w	(Title) IMINAL with the one or n ons in the foliation of the foliation o	Counts Interstate CONSPIRA Interstate	Grade F3 Grade	NCIC Offense Code Safety Zone cilitating the commisey or one or more of of such crime or of hin, Centre, Pennsyl the crime of theft bition 903 of the Crim Age 60 or Older	UCR/NIBRS Code Work Zone Ssion of the crime of f them would engage an attempt or vania and elsewhere, y unlawful taking, in les Code, 18 Pa.C.S.
Pen (if a ad? Pen ad? Pen ad? Pen ad? Pen (if a tute)	Offension Donate of Title	T Dat able cription accurring accurring accurring agree e 18,	3921 sa) ion (inc. sed as aking or estitutes to such or with other and in particular and in particula	Accident N clude the sociated Disposition, a crime or rime, that is ner individu sursuance of the A Section Accider Numbe	subsection umber name of si with this O Title 18, Sec did agree to a s, between Ju als that they, f such conspir	of the tatute or ordin ffense: The De tion 3921(a), did aid such other pe ne of 2020 and S or one or more acy one or more on of the on	PA Statute nance): CR fendant did, lagree with erson or pers September of them, wot overt acts w	(Title) IMINAL with the one or n ons in the factor of the	Counts Interstate CONSPIRA Interstate Intent of property of the planning of th	Grade F3 Grade	NCIC Offense Code Safety Zone cilitating the commisey or one or more of such crime or of hin, Centre, Pennsyl the crime of theft bition 903 of the Crime Age 60 or Older NCIC Offense Cod Safety Zone	UCR/NIBRS Code Work Zone Ssion of the crime of f them would engage an attempt or vania and elsewhere, y unlawful taking, in les Code, 18 Pa.C.S. BY UCR/NIBRS Cod Work Zone
cts of eft by conductation fendant lation 23. Pen (if a state of the	Offension DOTA The ate se In DOTA The ate se In DOTA The ate se T Dat able coript accumulation agree e 18,	3921 sa a) ion (inc sed ass aking or estitutes t such or with oth and in p Attemp 18 901 3922 a) on (inc ed ass entionall	Accident N clude the sociated Disposition, a crime or rime, that is her individu sursuance of Accider Numbe lude the r	subsection umber name of si with this O Title 18, Sec did agree to a s, between Ju als that they, f such conspir Solicitati 18 902 A a 3 Subsection name of sta with this Off prect a false is	of the nature or ordinate tatute ordinate tatu	PA Statute nance): CR fendant did, lagree with erson or pers September of them, wot overt acts w	(Title) IMINAL with the one or n ons in the factor of th	Counts Interstate CONSPIRA Interstate Intent of property of the planning of th	Grade Withhold pro	NCIC Offense Code Safety Zone cilitating the commisey or one or more of such crime or of hin, Centre, Pennsyl the crime of theft bition 903 of the Crime Age 60 or Older NCIC Offense Cod Safety Zone	UCR/NIBRS Code Work Zone Ssion of the crime of f them would engage an attempt or vania and elsewhere y unlawful taking, in les Code, 18 Pa.C.S. UCR/NIBRS Co	

POLICE CRIMINAL COMPLAINT **Docket Number:** Date Filed: OTN/LiveScan Number Complaint/Incident Number OCC-20-0020 First: Middle: Last: **Defendant Name: MICHAEL** C LYTER Inchoate ☐ Attempt ☐ Solicitation Number of Victims Age 60 or Older 18 901 A 18 903 Offense 18 902 A 4 3922 a 3 of the TITLE 18 1 F3 Offense# Lead? Section Subsection PA Statute (Title) Counts Grade **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number: 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 ☐ Attempt ☐ Solicitation ☐ Conspiracy Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 5 of the 3925 TITLE 18 F3 Offense# PA Statute (Title) Lead? Section Subsection Counts Grade **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number 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.

Number of Victims Age 60 or Older Offense 18 901 A 18 902 A 18 903 of the Lead? Offense# PA Statute (Title) Section Subsection Counts Grade **NCIC Offense Code** UCR/NIBRS Code PennDOT Data Accident ☐ Interstate ☐ Safety Zone ☐ Work Zone (if applicable) Number Statute Description (include the name of statute or ordinance): Acts of the accused associated with this Offense:

☐ Conspiracy

Inchoate

☐ Attempt

☐ Solicitation



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle:	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.



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

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



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

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



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

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.



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

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, Watsontown, 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 Watsontown, 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.



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

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.



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



Date Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
First:	Middle:	Last:
	/ / First:	

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



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

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



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle:	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 filling 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.



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



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



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020
Defendant Name:	First: MICHAEL	Middle:	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, Watsontown, 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.



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



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



Decket Number:	Date Filed:	US STN/LiveScan Number	Complaint/Incident Number OCC-20-0020	
Defendant Name:	First: MICHAEL	Middle:	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.
- 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 $\underline{1}$ through $\underline{20}$
- 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.)

CF	D	FEN	AR	ED	22
			עוי		22

AND NOW, on this date

2020

(Date)

(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.

(Magisterial District Court Number)

(Issuing Authority)



(Signature of Affiant)

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-3-04 VS. MDJ: Hon. Dominic Pelino (NAME and ADDRESS): Address: 576 East Main Street MARKAL MUNFORD First Name Middle Name Last Name Ge Hummelstown, PA 17036 SCI Mahanoy, 301 Morea Road Frackville, PA 17932 Telephone: (717)583-1912 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 Request Lab Decket/Number **Date Filed** OTN/LiveScan Number Complaint/Incident Number Services? ☐ YES 09/22/2020 OCC-20-0023 GENDER Co-Defendant(s) ров 12/30/1989 Add'i DOB Male Male First Name Middle Name Last Name Gen. ☐ Female AKA Asian RACE ☐ White Native American Unknown ETHNICITY Hispanic Non-Hispanic ☐ Unknown GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) BRO (Brown) ☐ PLE (Purple) Наіг BLK (Black) PNK (Pink) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color ☐ BLN (Bipnde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color MAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) ☐ XXX (Unknown) ☐ YES ☐ NO DNA **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number Defendant Fingerprinted** ☐ YES ⊠ NO Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code State Registration Comm'l Veh. School Veh. Reg. Haz Ind. Plate # mat same Sticker (MM/YY) П as Def. VIN Make Model Year Style Color П 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 09/22/2020 (Name of the attorney for the Commonwealth) (Date) KATHRYN GRADY 590 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) Pennsylvania Office of Attorney General 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 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 (Place-Political Subdivision) in DAUPHIN County on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020 [22] (County Code)

- ·											AL COMPLAINT
Doch	(et Nun	iber:	U 9	te Filed: み ンひり	119	TN/LiveSc	an Num	ber		mplaint/Incider CC-20-0023	nt Number
Defe	ndant I	lame:	First: MAR			Middle:			Last: MUNFOI	RD	
Whe (Set for without The ag	n there orth a <i>bri</i> ut more, ge of the	iS MORG efsumma Is not sul victim at	than one by of the fac ficlent in a s the time of the	offense, ead ts sufficient to ummary case, te offense may	ch offense sh advise the defen you must cite th	ould be need and outline to the second of the second outliness and the second outliness are second outliness and the second outliness are second outliness and the second outliness and the second outliness are second outli	umbere nature of ection(s) : lition, so	ed chronole the offense(and subsectional cial security	ogically. (s) charged. ion(s) of the numbers ar	A citation to the st statute(s) or ordin nd financial informa	iolated, if appropriate. latute(s) allegedly violated, lance(s) allegedly violated. ation (e.g. PINs) should not
inch Offe	Commission of the Commission o	☐ Atten 18 90		Solicitat		onspiracy 3 903			Number	of Victims Age 60	or Older
	1	91	1	В3	of the	18 PA C	.S.A.	1	F1		
Lead?	Offer #		Section	Subsection	חס	PA Statute	e (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
Sale Blick Street Cale.	nnDO1 applic	The second secon	Accident	Number				Interstate		☐ Safety Zone	☐ Work Zone
Acts of 2020 a conduction enterpolicy Munford	of the a nd Septe t of such rise cons rd, and o	accused ember of a n enterpris tituting a thers, and	associate 2020, within se's affairs th group of indi d Defendant of	d with this C the County of D rough a patterr viduals associa dld conduct or p	Pauphin, Schuyki n of racketeering ted in fact, altho	efendant did Il and York, activity, tha ugh not a le tly or indired	, being e Pennsylvatis, during gal entity tly, in the	mployed by ania and else ng the period rengaged in e conduct of	or associate ewhere, con ds as set for n commece a the affairs o	duct or participate, th herein. Defenda and consisting of W of the enterprise th	se, did between May of , directly or indirectly in the ont was associated with an Vendy Danfora, Markal orough a pattern of
Inche Offer	ate	□ Attem 18 901	pt	☐ Solicitati 18 902 A	on 🛭 Co	onspiracy 903			f	of Victims Age 60	or Older
	2	911	L	B4	of the	18 PA C.	S.A.	1	F1		
Lead?	Offense	•	Section	Subsection	1	PA Statute	(Titie)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
	nnDOT applica		Accident	Number				Interstate		Safety Zone	☐ Work Zone
Acts c Schuyki §911(b) commis enterpri	of the a li and Da l(3), per sion of t se set fo	ccused auphin, Yo taining to he crime o orth hereir	associated ork County, P Corrupt Orga of Corrupt Or n, would cond	I with this O enrisyvlania and inizations, that gariizations, did duct or particpa	d elsewhere, cor is, during the pe d conspire and a te, directly or ind	the Defendanspired to vio eriods as set gree with Ma directly, in the	ant, did b plate the forth her arkal Mun ne conduc	etween May provisions of ein, Defenda ford and oth ct of the affa	of 2020 and f Section 91 ant, with the ner Individua airs of the er	1(b)(3) of the Crime intent of promotir ils, while employed aterprise through a	20, within the County of the Code, 18 Pa.C.S. and or facilitating the lor associated with the pattern of racketeering
activity	as define	e in 18 PA	A.C.S.A. §911	(h), in violation	of Section 911(l	o)(4) of the	Crimes C	odes, 18 Pa.	C.S.A. §911	(b)(4).	
Inch Offe		☐ Atte 18 9		☐ Solicitati 18 902 A		nspiracy 903		Numbe	r of Victims	Age 60 or Older	
	3)21	A	of the	18 PA C.		1	F1	NCIC Offence C	Pada UCDANDOS Cada
distribution of the control of	Offer nnDOT	Data	Section Accide	Q1004 (69 ps 24	VII	PA Statute		Counts Interstate	Grade .	NCIC Offense C ☐ Safety Zone	UCR/NIBRS Code Work Zone
	applic Desci		Numb nclude the	2.1.2.12.1	- atute or ordina	ance): THE					
control o catastrop alsiey fil	ver, mov her white ed applic	able prop th results tations for	erty of anoth in substantia r the Pandem	ner with intent t I damage to pro ic Unemployme	to deprive him th operty, hardship ent Assistance be	nereof. The l , suffering o enefit progra	Defendan r possible m throug	t commited i loss of life. In the PA De	the offense of To Wit: We partment of	during a Naturai Di endy Danfora, Mark	kal Munford, and others y website for themselves

POLICE CRIMINAL COMPLAINT

Docke Defend	23	<u> </u>	(Sept. 1987)		Filed: <i>えいか</i> AL		9/1	TN/LiveSca Middle: T	n Num	ber		Last:	1	nplaint/Incident I C-20-0023	Num	ber
Incho	Inchoate ☐ Attempt ☐ Solicitation ☑ Conspiracy Number of Victims Age 60 or Older															
Offen			001 A			902 A		903								
Lead?	4 Offens		921 Sec	tlon	_ A	ubsection	of the	18 PA C.: PA Statute		1	Counts	F1	rade	NCIC Offense Co	do	UCR/NIBRS Code
Per	inDOT applica	Data	and the beginning and the	Accide: Numbe	nt .	3D36C0011		FA Statute] In	terstate	Ĭ		Safety Zone		☐ Work Zone
Statute	Desc	ription	(inclu	de the	name	e of statute	e or ord	inance): TH	EFT BY	UN	LAWFUL	TAK	ING			,
Theft By conduct was to commit Defendar violation	Unlawfo which co it such o nt did ag of Title	of Taking constitute crime, the gree with 18, and	g Or Dis s a crin at is, b n other in purs	position ne or di etween individu uance o	n, Title : d agree May of lals that of such o	18 Section 3 to aid such 2020 and So they, or on conspiracy o	921(a), di other per eptember e or more ne or more	d agree with o son or person of 2020, with of them, wou re overt acts w	one or n s in the in the Co lid enga vere con	nore plar ount ge in	other per nning or co by of Daup n conduct tted, in vio	rsons ommis ohin, S const olation	that the ssion of schuyki tituting of Sec		of the in att Ivani by ur nes (em would engage in lempt or solicitation a and elsewhere, lawful taking, in Code, 18 Pa.C.S.
Incho Offen	ACCOUNT OF THE PARTY OF THE PAR	☐ Atto	empt 901 A	To the second	_	licitation 902 A		onspiracy 3 903		į.	Number	of V	ictims	Age 60 or Older		
	5		922		Α	1	of the	18 PA C.		T :	1	F1				
	Offen nDOT applica	Data	Sec	ction Accide Numbe	nt	Subsection		PA Statute		□ Ir	Counts nterstate	G	Frade [NCIC Offense Co Safety Zone	de	UCR/NIBRS Code Work Zone
			includ	le the	name	of statute	or ordii	nance): THE	FT BY	DEC	EPTION	L			•	,
person de deception Wendy Da and Indus	ceives i as to a infora, i try web	f he inte person's Markal M site for i	ntionall s intent lunford, themse	y create ion to p , and ot lves and	es or rei erform thers fal d other i	inforces a fa a promise si sely filed ap individuals, a	lse impres nall not be plications although i	ssion, inicudine Inferred fron for the Pande	g false in the fac mic Une walify fo	mpr et ale empl r the	essions as one that h loyment A e benefits.	to la e did ssista	w, valu not su nce pr	ie, intention or othe bsequently preform	er sta the PA D	promise. To Wit: epartment of Labor
Inchoa Offens		□ Atte n			□ Solid 18 90	citation 02 A	⊠ Coi	nspiracy 903		П	Number o	f Vict	tims A	ge 60 or Older		
	6	39	22		A2		of the	18 PA C.S	.А.	1		F1				
	Offense DOT [Data		ccident	33.3474	osection		PA Statute (T			ounts erstate	Gra		NCIC Offense Code Safety Zone	,	UCR/NIBRS Code Work Zone
	oplical Descri		Carried Controllina	lumber e the r	name	of statute	or ordin	ance): THE				<u> </u>				
person dec deception a Wendy Dai	ceives if as to a nfora, M	he inter person's larkal Mo	ntionally intentionally unford a	create on to pe and oth	s or reir erform a ers false	nforces a fals a promise sh ely filed appl	se impres all not be ications f	sion, inlouding inferred from or the Panden	false in the fact nic Unen	npre t alo nplo	essions as one that he oment Ass	to lav e did i sistan	v, valu not sub ce ben	sheld property of an e, intention or other sequently preform efit program throug se fraudulent filings	r stat the p h the	e of mind; but promise. To Wit: PA Department

				WAR LOI	ICE CRIMINAL	
Docket Number:	Date Filed:	(10 OTN/L	iveScan Number		Complaint/Incident N	umber
(Vango	4/21/00	441284	<u> </u>		OCC-20-0023	
Defendant Name:	Firšt: MARKAL	T	die:	Last	: NFORD	
	ITANNAL			וטויו	NI OKD	
Inchoate		-		Number of	Victims Age 60 or Older _	
Offense 18 90	7 A 10 902	76 903	<u>'</u>	<u> </u>	<u> </u>	
□ 7 39:	25 A	of the 18	PA C.S.A.	2 F	1	
Lead? Offense#			PA Statute (Title)	Counts	Grade NCIC Offense Cod	ie UCR/NIBRS Code
PennDOT Data	Accident			nterstate	☐ Safety Zone	☐ Work Zone
(if applicable) Statute Description (in	Number —	etatuta ar ardinan				
Statute Description (iii	cidde the name of	Statute of Ordinant	Je). RECEIVING 5	IOLEN PROP	CKIT	
A - 1 C 11 1 -		055				
					ty of theft if she intentionally en stolen, unless the propert	
					ly filed for Pandemic Unempl	
benefits program through th	ne Pennsylvania Labor a	and Industry website fo	r herself and multipl	e other individ	uals, although they did not o	
Pandemic Unemployment A	ssistance benefits. The	fraudlent applications	totaled approximatel	y \$153,470.		
•						
inchoate	1 D 0-11-14-	·				
Inchoate		1 —	acy	Number of Vi	ctims Age 60 or Older	
		<u> </u>				
					·····	
□ 8 7512		of the 18	PA C.S.A. 2	F3		
Lead? Offense#	Section Subsec	AND THE PARTY OF T			rade NCIC Offense Code	UCR/NIBRS Code
Lead? Offense# PennDOT Data	Section Subsection Subsection	AND THE PARTY OF T	Statute (Title)		rade NCIC Offense Code	UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable)	Section Subsection Accident Number ———	otion PA	Statute (Title)	Counts G erstate	☐ Safety Zone	
Lead? Offense# PennDOT Data (if applicable)	Section Subsection Accident Number ———	otion PA	Statute (Title)	Counts G erstate	☐ Safety Zone	
Lead? Offense# PennDOT Data (if applicable) Statute Description (inc	Section Subset Accident Number Clude the name of	statute or ordinanc	Statute (Title) C	counts G erstate E OF COMMU	☐ Safety Zone NICATION FACILITY	☐ Work Zone
PennDOT Data (if applicable) Statute Description (incomes	Section Subsection Subsection Subsection Subsection Subsection Number Clude the name of Sociated with this Clude the Name of Sociated with the Name of S	estatute or ordinance Offense: To that the I	Statute (Title) Color Into	Counts G erstate E OF COMMU	☐ Safety Zone NICATION FACILITY Facility to commit, cause or form	☐ Work Zone
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete accused as commission or the attempt to controll Substance Drug, De	Section Subset Accident Number Clude the name of Sociated with this Chereof of any crime whoice and Cosmetic Act.	statute or ordinanc Offense: To that the lich constitutes a felony To Wit: Wendy Danfor	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor	counts G erstate E OF COMMU emmunication der the act of	Safety Zone NICATION FACILITY facility to commit, cause or facility 14, 1972 (P.L.233, No. ctronic communications thro	☐ Work Zone acilitate the 64), known as the ugh the Department
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete accused as commission or the attempt to Controll Substance Drug, De of Corrections SCI Mahanoy	Section Subset Accident Number Clude the name of Sociated with this of hereof of any crime whoice and Cosmetic Act. telephone communication	statute or ordinanc Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided	Safety Zone NICATION FACILITY facility to commit, cause or fapril 14, 1972 (P.L.233, No. ctronic communications thro	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmates	Section Subset Accident Number Clude the name of Sociated with this of hereof of any crime whoice and Cosmetic Act. telephone communication	statute or ordinanc Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided	Safety Zone NICATION FACILITY facility to commit, cause or fapril 14, 1972 (P.L.233, No. ctronic communications thro	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmates	Section Subset Accident Number Clude the name of Sociated with this of hereof of any crime whoice and Cosmetic Act. telephone communication	statute or ordinanc Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided	Safety Zone NICATION FACILITY facility to commit, cause or fapril 14, 1972 (P.L.233, No. ctronic communications thro	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmates	Section Subset Accident Number Clude the name of Sociated with this of hereof of any crime whoice and Cosmetic Act. telephone communication	statute or ordinanc Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided	Safety Zone NICATION FACILITY facility to commit, cause or fapril 14, 1972 (P.L.233, No. ctronic communications thro	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in accused as commission or the attempt to the controll Substance Drug, Defended in accused in accused as commission or the attempt to the controll Substance Drug, Defended in accused in accused as commission or the attempt to the controll Substance Drug, Defended in accused	Section Subset Accident Number Clude the name of Sociated with this of hereof of any crime who wice and Cosmetic Act. telephone communications. All applications filed	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Uner	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters aployment Assistance	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided e were filed the	Safety Zone NICATION FACILITY facility to commit, cause or facility to 200 (P.L.233, No. ctronic communications through the PA Department of	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in accused as commission or the attempt to the controll Substance Drug, Defended in accused in accused as commission or the attempt to the controll Substance Drug, Defended in accused in accused as commission or the attempt to the controll Substance Drug, Defended in accused	Section Subset Accident Number Clude the name of Sociated with this Chereof of any crime who wice and Cosmetic Act. telephone communcations. All applications filed	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Uner	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters aployment Assistance	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided e were filed the	Safety Zone NICATION FACILITY facility to commit, cause or fapril 14, 1972 (P.L.233, No. ctronic communications thro	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmate: Website. Inchoate Attemption 18 901	Section Subset Accident Number Clude the name of Sociated with this Chereof of any crime who wice and Cosmetic Act. telephone communcations. All applications filed	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll A Conspi	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters aployment Assistance	counts G erstate E OF COMMU emmunication der the act of d utilitized ele which provided e were filed the	Safety Zone NICATION FACILITY facility to commit, cause or facility to 200 (P.L.233, No. ctronic communications through the PA Department of	☐ Work Zone acilitate the 64), known as the ugh the Department nformation for Markal
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, Deformed in the information of the inmates website. Inchoate Offense Attempt 18 901	Section Subset Accident Number Clude the name of Sociated with this of thereof of any crime who wice and Cosmetic Act. It telephone communcations. All applications filed Sociated with this of the property	statute or ordinance Offense: To that the Bich constitutes a felony To Wit: Wendy Danfortons and e-mail systems for the Pandemic Unerroll A Conspired 18 903 of the	Statute (Title) Ce): CRIMINAL USI Defendant, uses a counder this title or una and Markal Munfor, and mailed letters in ployment Assistance	erstate E OF COMMU Immunication Inder the act of Index	Safety Zone NICATION FACILITY facility to commit, cause or facility 14, 1972 (P.L.233, No. ctronic communications through the PA Department of the personal identification is rough the PA Department of the personal identification is rough the PA Department of the personal identification is rough the PA Department of the P	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete incomplete i	Section Subset Accident Number Clude the name of sociated with this of thereof of any crime who to the communication of the communic	statute or ordinance Offense: To that the Bich constitutes a felony To Wit: Wendy Danfortons and e-mail systems for the Pandemic Unerroll A Conspired 18 903 of the	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters aployment Assistance racy	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, Deformed in the information of the inmates website. Inchoate Offense Attempt 18 901	Section Subset Accident Number Clude the name of Sociated with this of thereof of any crime who wice and Cosmetic Act. It telephone communcations. All applications filed Sociated with this of the property	statute or ordinance Offense: To that the Bich constitutes a felony To Wit: Wendy Danfortons and e-mail systems for the Pandemic Unerroll A Conspired 18 903 of the	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ura and Markal Munfor, and mailed letters aployment Assistance racy	erstate E OF COMMU Immunication Inder the act of Index	Safety Zone NICATION FACILITY facility to commit, cause or facility 14, 1972 (P.L.233, No. ctronic communications through the PA Department of the personal identification is rough the PA Department of the personal identification is rough the PA Department of the personal identification is rough the PA Department of the P	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete incomplete i	Section Subset Accident Number Clude the name of Sociated with this of the sociated with	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll A Conspi 18 903 of the Clion PA	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ural and Markal Munfor, and mailed letters apployment Assistance racy Statute (Title)	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, Defense in the accused as commission or the attempt to the controll Substance Drug, Defense in the accused as commission or the attempt to the commission or the accused as commission or the attempt to the commission of the accused as commission or the	Section Subset Accident Number Clude the name of Sociated with this of the sociated with	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll A Conspi 18 903 of the Clion PA	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ural and Markal Munfor, and mailed letters apployment Assistance racy Statute (Title)	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to the controll Substance Drug, Defense in the accused as commission or the attempt to the controll Substance Drug, Defense in the accused as commission or the attempt to the commission or the accused as commission or the attempt to the commission of the accused as commission or the	Section Subset Accident Number Clude the name of Sociated with this of thereof of any crime whoice and Cosmetic Act. telephone communcations. All applications filed Section Subset Accident Number Lude the name of section Subset Number	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll of the ction PA ctatute or ordinance	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ural and Markal Munfor, and mailed letters apployment Assistance racy Statute (Title)	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmates Website. Inchoate	Section Subset Accident Number Clude the name of Sociated with this of thereof of any crime whoice and Cosmetic Act. telephone communcations. All applications filed Section Subset Accident Number Lude the name of section Subset Number	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll of the ction PA ctatute or ordinance	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ural and Markal Munfor, and mailed letters apployment Assistance racy Statute (Title)	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmates Website. Inchoate	Section Subset Accident Number Clude the name of Sociated with this of thereof of any crime whoice and Cosmetic Act. telephone communcations. All applications filed Section Subset Accident Number Lude the name of section Subset Number	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll of the ction PA ctatute or ordinance	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ural and Markal Munfor, and mailed letters apployment Assistance racy Statute (Title)	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code
Lead? Offense# PennDOT Data (if applicable) Statute Description (incomplete in the accused as commission or the attempt to controll Substance Drug, De of Corrections SCI Mahanoy Munford and 6 other inmates Website. Inchoate	Section Subset Accident Number Clude the name of Sociated with this of thereof of any crime whoice and Cosmetic Act. telephone communcations. All applications filed Section Subset Accident Number Lude the name of section Subset Number	statute or ordinance Offense: To that the lich constitutes a felony To Wit: Wendy Danforons and e-mail systems for the Pandemic Unerroll of the ction PA ctatute or ordinance	Statute (Title) Ce): CRIMINAL US Defendant, uses a counder this title or ural and Markal Munfor, and mailed letters apployment Assistance racy Statute (Title)	counts G erstate E OF COMMU emmunication nder the act of d utilitized ele which provider were filed the Number of V	Safety Zone NICATION FACILITY Facility to commit, cause or facility to commit, cause or facility to commit, cause or facility to communications through the personal identification is rough the PA Department of facilities age 60 or Older	Work Zone acilitate the 64), known as the ugh the Department information for Markal Labor and Industry UCR/NIBRS Code



A.			
/Obcket-Number: , ,	Date Filed:	/ PTN/LiveScan Numb	ger Complaint/Incident Number
(1000)	09/22/2020	uy dy dy dy	OCC-20-0023
	First:	Middle:	Last:
Defendant Name:	MARKAL	T	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).

			Ø P(OLICE CRIMINAL COMPLAIN
Docket Number:	Pate Filed:	OTN/Lives	can Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: MARKAL	Middle:	1	ast: IUNFORD
2. I ask that a warra	ant of arrest or a su	mmons be issued and	d that the defendant	be required to answer the charges I have
belief. This verifi		ect to the penalties o		t of my knowledge or information and e Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	onsists of the prece	ding page(s) number	ed $\underline{1}$ through $\underline{}$.	
	/Ivania that require			c Access Policy of the Unified Judicial ents differently that non-confidential
of Pennsylvania and	d were contrary to the definition of arrest can be is:	ne Act(s) of the Asser	mbly, or in violation o	pace and dignity of the Commonwealth of the statutes cited. ust be completed, sworn to before the
				(Signature of Affiant)
(Date)	0 1	(Year)		(Signature of Amant)
AND NOW, on this da	te <u>912</u>	1120 11	certify that the complai	int has been properly completed and verified.
An affidavit of probable	e cause must be com	pleted before a warrant	can be issued.	
(Magisterial District Co	ourt Number)	(Issuing Au	ithority)	SEAL COURT OF DAUTHINING

POLICE CRIMINAL COMPLAINT

Defendant Name:

Date Filed:

OCC-20-0023

First:

MARKAL

Defendant Name:

Date Filed:

OCC-20-0023

Middle:

T

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



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

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.



Docket Number:	Date Filed: /	OTN/I	iveScan Number		omplaint/incident Number CC-20-0023	
	First:	Mi	idle:	Last:		
Defendant Name:	MARKAL	T		MUNFO	RD	

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 COMMUNCIATIONS

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



•	·						
Docket Nu	mber:	Date Filed:	C	TN/LiveScan Nur	nber		Complaint/Incident Number
		11					OCC-20-0023
		First:		Middle:		Last:	
Defendant	Name:	MARKAL		T		MUN	FORD

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.



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

- 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



Docket Number:	Date Filed:	O	TN/LiveScan Nu	mber	Complain	t/Incident Number	
	1 1				OCC-20	-0023	
	First:		Middle:	-	Last:		
Defendant Name:	MARKAL		T.		MUNFORD		

In one communication, post marked June 24, 2020, Munford directs Danfora to "adjust the weeks or make it seem as the 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-ficonnections 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.



				. – –.	
Docket Number:	Date Filed:	0	TN/LiveScan Number		Complaint/Incident Number
					OCC-20-0023
	First:		Middle:	Last:	
Defendant Name:	MARKAL		Τ	MUNF	ORD

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.



D	ocket Number:	Date Filed:	0	TN/LiveScan Number	•	Complaint/Incident Number		
						OCC-20-0023		
		First:		Middle:		Last:		
	efendant Name;	MARKAL		T	ĺ	MUNFORD		

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



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

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



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

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	<u>Lgrimes887@gmail.com</u>	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



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

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.



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



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



Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
	First:	Middle:	Last:
Defendant Name:	MARKAL	\ T	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Defendant Name: Defendant Name: Defendant Name: Defendant Name: Defendant Name: Defendant Name: Defendant Name: Defendant Name: Markal Defendant Name: Markal Middle: T Middle: MunFord (Signature of Affiant) Sworn to me and subscribed before me this Defendant Name: Markal Markal Middle: Markal Markal Middle: Markal MunFord Magisterial District Judge
Sworn to me and subscribed before me this Align: Markal T
Sworn to me and subscribed before me this 2 day of Septem for 2020 9/2/20 Date Magisterial District Hundred My commission expires first Monday of January, 2022
Sworn to me and subscribed before me this 2 day of Septem for 2020 9/2/20 Date Magisterial District Hundred My commission expires first Monday of January, 2022
My commission expires first Monday of January, 2022
My commission expires first Monday of January, 2022
OF DATING

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-3-04 VS. MDJ: Hon. Dominic Pelino (NAME and ADDRESS): Address: 576 East Main Street **FREDERICK** F OWENS III First Name Middle Neme Lest Name Ga Hummelstown, PA 17036 SCI Mahanoy, 301 Morea Road Frackville, PA 17932 Telephone: (717)583-1912 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 Request Lab Date Filed Docker Number OTN/LiveScan Number Complaint/Incident Number. Services? 09/22/2020 ☐ YES OCC-20-0023 **GENDER** ров 10/30/1988 Co-Defendant(s) \boxtimes Add'I DOB ☑ Male First Name Middle Name Last Name Gen. ☐ Female AKA RACE White ☐ Asian Unknown Native American ETHNICITY Hispanic Non-Hispanic Unknown ☐ GRY (Gray) RED (Red/Aubn.) SDY (Sandy) ☐ BLU (Blue) PLE (Pumle) ☐ BRO (Brown) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Baid) PNK (Pink) GRN (Green) Color BLN (Blonde / Strawberry) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) Eye Color ☐ HAZ (Hazel) PNK (Pink) MAR (Maroon) ■ MUL (Multicolored) XXX (Unknown) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** Defendant Fingerprinted ☑ NO ☐ YES Ft. HEIGHT In. Fingerprint Classification: DEFENDANT VEHICLE INFORMATION State Haz Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Reg. mat Ind. same Plate # Sticker (MM/YY) as Def. VIN Make Model Year 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 09/22/2020 (Name of the attorney for the Commonwealth) (Date) 590 KATHRYN GRADY (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) 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] Harrisburg City (Subdivision Code) (Place-Political Subdivision) in DAUPHIN County on or about MAY 18, 2020 THROUGH SEPTEMBER 1, 2020 (County Code)

Docket Nun	nher	Date Filed:	o OTN/LiveS	an Number	Complaint/Incider	
7 7	5(2)	((,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	11975		OCC-20-0023	it Munibel
	-40-	First:	Middle:	- 1	Last:	
Defendant I	inno Al	FREDERICK	E	1	OWENS III	
					OTALIAN TIT	
The acts co	mmitted by the	ne accused are d	escribed below with e	ach Act of Assemb	ly or statute allegedly v	iolated if appropriate
			ch offense should be i			iolatea, il appropriate.
(Set forth a bri	ief summary of the	he facts sufficient to a	dvise the defendant of the	nature of the offense(s) charged. A citation to the st	atute(s) allegedly violated,
without more,	is not sufficient.	in a summary case,	ou must cite the specific s	ection(s) and subsection	on(s) of the statute(s) or ordin	ance(s) allegedly violated.
be listed. If the	e victim at the time e identity of an ac	count must be estab	be included if known, in ac lished, list only the last for	idition, social security i ir didits. 204 PA.Code 8	numbers and financial inform	ation (e.g. PINS) should not
			,,	g	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Inchoate	☐ Attempt	☐ Solicitat	on 🔲 Conspiracy	1	November of Madiena Acc 66	Non Older
Offense	18 901 A	18 902 A	18 903		Number of Victims Age 60	or Older
			2500 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
oxtimes 1	3921	A	of the 18 PA (C.S.A. 1	F2	
Lead? Offer	nse Secti	on Subsectio	PA Statu	te (Title) Counts	Grade NCIC Offense	UCR/NIBRS Code
PennDOT		OII CODSECIO	r A State	le (TRIE) COUNTS	Code Code	OCKNIDKS COUE
(if applic		cident Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
		de the name of s	tatute or ordinance): T	HEET DV HAN AWELL	TAKTNIC	
Statute Des	cription (micia	de the hanne of s	latute of ordinance). I	HEFT BY UNLAWFUL	ARING	
Acts of the	accused asso	ciated with this O	ffense: To that the Defer	dant, a person is guilty	of theft if he unlawfully takes	s, or exercises unlawful
control over, m	ovable property	of another with inteni	to deprive him thereof. The	e Defendant commited	the offense during a Natural	Disaster involving a
catastropher wi	hich results in su	bstantial damage to p	roperty, hardship, sufferin	g or possible loss of life	. To Wit: Wendy Danfora, Ma	arkal Munford, and others
faisley filed app	lications for the	Pandemic Unemployn	nent Assistance benefit pro	gram through the PA D	epartment of Labor and Indus	try website for themselves
which \$9,820 w		ot quality for the bene	erics. Frederick Owens pro	vided his Date of Birth a	and Social Security Number fo	r the benefit program, to
WINCII \$5,020 W	eas obtained.					
						AAA MAAAA AAAA AAAA AAAAA AAAAA AAAAA AAAAA AAAA
	☐ Attempt	☐ Solicitation	on 🖾 Conspiracy		Number of Victims Age 60	or Older
Offense	18 901 A	18 902 A	18 903			
□ 2	3921	Α	of the 18 PA C	.S.A. 1	F2	
Lead? Offense	e# Sectio	n Subsection	PA Statut	e (Title) Counts	Grade NCIC Offense	UCR/NIBRS Code
PennDOT	Πata				Code	
(if applica	A CO	dent Number		☐ Interstate	☐ Safety Zone	☐ Work Zone
		le the name of st	atute or ordinance): Ti	HEET BY UNLAWFUL	TAKING	
				DI ONDANIO	This is a second of the second	
						Marie Control of the
Acts of the a	ccused assoc	iated with this Of	fense: The Defendant did	, with the intent of pro	moting or facilitating the com	mission of the crime of
Theft By Unlawf	ul Taking Or Disp	position, Title 18 Sect	on 3921(a), did agree with	one or more other per	sons that they or one or more	of them would engage in
conduct which c	onstitutes a crim	e or did agree to aid	such other person or perso	ns in the planning or co	mmission of such crime or of	an attempt or solicitation
o commit such	crime, that is, be	tween May or 2020 a	na September of 2020, wit	nin the County of Daup	hin, Schuykill and York, Penns	sylvania and elsewhere,
violation of Title	18 and in nursu	nuividuals that they, t	one or more or them, wo	were committed in vio	constituting the crime of thefi lation of Section 903 of the Cr	t by unlawful taking, in
903. To Wit: Fr	ederick Owens p	rovided his Date of B	rth and Social Security num	nber for the benefit pro	gram, to which \$9,820 was o	htained.
					-14111 44 1111 47 14 EV	J. 1001
Inchoate	☐ Attempt	☐ Solicitation		Number	of Victims Age 60 or Older	
Offense	18 901 A	18 902 A	18 903			
	3922	A2	of the 18 PA C	.S.A. 1	F3	
Lead? Offen		ion Subsection	n PA Statut	(Title) Counts	Grade NCIC Offense C	ode UCR/NIBRS Code
PennDOT		Accident		☐ Interstate	☐ Safety Zone	☐ Work Zone
(if applica		Number	(
tatute Descr	iption (include	e the name of sta	tute or ordinance): тн	EFT BY DECEPTION	•	
cts of the ac						
old of the ac	cused associa	ated with this Off	ense. In that the Defenda	nt did intentionally obta	ined or withheld property of	another by deception A
erson deceives i	cused associated the intentionally	ated with this Offe	ense: In that the Defenda	nt did intentionally obta	nined or withheld property of a	another by deception. A
erson deceives i eception as to a	f he intentionally	creates or reinforces	a false impression, inicudii	ng false impressions as	to law, value, Intention or oth	er state of mind; but
eception as to a /endy Danfora, I	f he intentionally person's intention Markal Munford,	creates or reinforces on to perform a promi and others falsely file	a faise impression, inicudionse shall not be inferred from applications for the Pand	ng faise impressions as in the fact alone that he emic Unemployment As	to law, value, intention or othe did not subsequently preform sistance program through the	er state of mind; but n the promise. To Wit: PA Department of Labor
eception as to a Jendy Danfora, I ad Industry web	f he intentionally person's intention Markal Munford, site for themselv	creates or reinforces on to perform a promi and others falsely file	a false impression, inicudions se shall not be inferred from the Pand applications for the Pand als, although they did not continuous.	ng faise impressions as in the fact alone that he emic Unemployment As	to law, value, intention or other did not subsequently prefore	er state of mind; but n the promise. To Wit: PA Department of Labor

Pocke	t.Numl	er:	v	Date	Filed: スリン	()	9	IN/LiveSca	in Numb		P	OLI	Com	CRIMINAI plaint/incident C-20-0023		OMPLAIN ber
Defend	lant Na	ime:		First:	ERICK			Middle: E	<i>78</i>			ast:	NS II			·
	MIN 10 11 10 10 10 10 10 10 10 10 10 10 10				•		<u>1</u>									
Incho Offen		☐ Atte	empt 901 A		☐ Solici			onspiracy 903			Number	of Vic	tims A	ge 60 or Older		
	4	3	922		A2		of the	18 PA C.	S.A.	1		F3				
	Offens InDOT applica	Data	Se	ction Accide Numbi	nt	section		PA Statute	1		counts erstate	Gra	ade	NCIC Offense Co Safety Zone	de	UCR/NIBRS Code Work Zone
			(inclu	ide the	name o	f statute	or ordi	nance): T H	IEFT BY I	DEC	EPTION					
deception Wendy D of Labor	n as to a anfora, and Ind	a person Markal I ustry we	n's inter Munfor ebsite (ntion to d and o for them	perform a thers false iselves and	promise sh y filed appl other indiv	all not be lications viduals, a	e inferred fro for the Pand	m the fac emic Uner did not o	t alo	one that he	ne did ssistan	not sul nce ben	ie, intention or oth bsequently prefor lefit program throi rederick Owens pr	m the ugh th	promise. To Wit: e PA Department
Incho Offen		☐ Att	empt 901 A		☐ Solic 18 90			onspiracy 903			Number	of Vic	ctims A	Age 60 or Older		
		3	925		Α	3	of the	18 PA.C	S.A.	1		F3				
The state of the s	Offen nDOT	Data	Se	Accide Numb	ent -	section		PA Statute	1		Counts erstate	Gr	ade	NCIC Offense Co Safety Zone	ode	UCR/NIBRS Code Work Zone
	applica Descr		(inclu	44,000,000,000,000,000	IN THE PARTY OF TH	statute o	or ordin	ance): RE	CEIVING	STO	DLEN PR	OPER	RTY			
disposes o or dispose penefits p	of mova ed with i rogram Unemp	ble prop ntent to through	ert of a restor	another e it to ti ennsylva	knowing ti he owner, ania Labor	nat it has bo Fo Wit: We and Industr	een stole ndy Dani ry websit	en, or believi fora, Markal e for herself	ng that it : Munford, and multi	has and iple o	probably others fa other indi	been Isely f ividual	stolen, filed for Is, altho	t if she intentional unless the proper Pandemic Unemp ough they did not r for the benefit p	ty is r ploymo qualify	eceived, retained, ent Assistance y for the
Inchoat Offens		Atten 18 90			☐ Solicita 18 902 /		☐ Con	spiracy 03		Nı	umber of	f Victi	ms Ag	e 60 or Older _		
						of	the			٠.						
	Offense DOT L oplicat)ata		on Accident Number		ction		PA Statute (unts state	Grad		NCIC Offense Code Safety Zone		UCR/NIBRS Code Work Zone
			includ	le the	name of	statute o	r ordina	ance):				•				-
cts of the	ne acc	used a	assoc	iated v	with this	Offense:								0.02		

			POLICE CRIMINAL COMPLAIN
Pogket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
Defendant Name:	First: FREDERICK	Middle:	Last: OWENS III
I ask that a warra made.	ant of arrest or a se	ummons be issued and that the defer	ndant be required to answer the charges I have
belief. This verific	octs set forth in this cation is made sub cation to authoritie	eject to the penalties of Section 4904	e best of my knowledge or information and of the Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint co	nsists of the prece	eding page(s) numbered ${f 1}$ through ${f _}$	_·
	<i>Ivania</i> that require		Public Access Policy of the Unified Judicial ocuments differently that non-confidential
of Pennsylvania and	were contrary to for arrest can be is	the Act(s) of the Assembly, or in viola	he peace and dignity of the Commonwealth ation of the statutes cited. se must be completed, sworn to before the
			or Grades
(Date)	•	(Year)	(Signature of Afflant)
AND NOW, on this dat	· 9/2/	ا certify that the co	omplaint has been properly completed and verified.
An affidavit of probable \begin{align*} \lambda & \la) Y	(Issuing Authority)	O SERIAL DISCONDING THE PARTY OF THE PARTY O

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



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



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0023
All and finding the second second second	First:	Middle:	Last:
Defendant Name:	FREDERICK	E	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 COMMUNCIATIONS

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



Docket Number:	Date Filed:	, 0	TN/LiveScan Number	Complaint/Incident Number OCC-20-0023
	First:		Middle:	Last:
Defendant Name:	FREDERICK		E	OWENS III

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.



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

- 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



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

In one communication, post marked June 24, 2020, Munford directs Danfora to "adjust the weeks or make it seem as the 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-ficonnections 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.



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

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.



Docket Number:	Date Filed:	0	TN/LiveScan Number		Complaint/Incident Number
	11				OCC-20-0023
	First:		Middle:	Las	t:
Defendant Name:	FREDERICK		E	OW	VENS III

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



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

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



`Docket Number: Da		Date Filed: / /	OTN/LiveScan Numbe	Complaint/Incident Number OCC-20-0023
		First:	Middle:	Last:
	Defendant Name:	FREDERICK.	ſΕ	OWENS III

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	<u>Lgrimes887@gmail.com</u>	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		



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

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.



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

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



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

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,



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

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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

\$				<u> </u>	NAL COMPLAIN
Dooker Number:	Pate Filed:	L915	vescan Number	Complaint/Inci OCC-20-002	
Defendant Name:	First: FREDERICK	Mid E	dle:	Last: OWENS III	Median
				Kyrady	
			1	(Signature of	Afriant)
Sworn to me and sub	scribed before me this	21	gay of	eptember	2020
Da مرازدران	te	(1		, Magisterial Dis	trict Judge 🐛
1000110			/ /	MINISTER	A OF POULL
My commission expire	es first Monday of Jar	nuary,		M. S. Links	
				*	
					<u> </u>
				THE COUNTY OF	OUR'T LEATHER THE
					AUNILIA.

	MON NTY		ALTH		ENNS) IPHIN	/LVANIA				Š.		POLICE			OF PE			
	vame: ł		Number			C PELINO ST MAIN S		DEX		:			and.	ADDRES PIT	TS		_	7
					17036	LSTOWN,	PA	1200	ame PHOEN MOKY LEGEV	CHIC				Last	Nam e			Gen.
Telepi	none:				(717) 58	3-1912		1007	LEGEV	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, [_	10-12-0						
							NCIC EX	TRADITI	ON CO	DE T	/PE							
3-Fel	ony Lld. ony Sum		g Slates		A-Mledem	Pend. Pend. Extradit eanor Full eanor Limited			D-Misc	iemear Iemear	nor No nor Pe	rrounding States Extradition nding nding Extradition De	łerm		Dietence	t.		
<u> 4-Fer</u>	ony No E	XŁ.			P-Miscetti		ENDANT ID	ENTIFIC										
Docket	Numbe	4)-J.		ite Filed 0/22/20		iveScan N		P	Com	plain	t/incident Numbo ·0030-1	er		est Lai		vices	3?
GENDE	R	DOB	09/17/	1958	PC	OB						Add'! DOB			Co-De	fend	ant(s) 🗆
Male Fema	и́е	AKA		First Na KEVIN					elbbiM	Name;				Name: RY			Ge	n.
RACE			White		Asla Asla	n	⊠ Black			Nalive	Ameri	can		[Unkn	own		
ETHNIC	ITY		Hispenic				⊠ No	n-Hispani	C					OWN				
HAIR C	OLOR		GRY (G BLK (Bi BLN (BI	• /	аwbелту)		(Red / Aubn. G (Orange)		SDY (S	hite)		BLU (Blue) XXX (Unk. / Bald)	ļ	PLE (F	Green)		PNK	(Brown) . (Pink)
EYECO	LOR			(Black) (Hazel)		BLU (Blue) MAR (Mero	on)	⊠ BRO)] GRN (Green)] MUL (Multicolore	i)		GR'	((Unk	nown)
															WEK			
DNA			YES 🛚	NO	DNA L	ocation	T								UNKN	Y. HE		T In
FBI Nur						.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	MNU Num	Det							-		T	1
Defenda				_ YE	s 🛛 NO													
Fingerp	rint Ci	ssific	ation:				EFENDAN'	r VEUIC	I E INE	OPM	TION							
Plate #	Stat		zmat	Regis	tration St	icker (MM/			n'i Veh		1	School Veh.	01	h. NCIC	Veh. C	ode		Reg. same
VIN	[<u>-</u>	Year	Make		Mode				Style		1	Color				as Def.
						61- 57A			und hin		••							
Office of	the A		y for th hasyasqui	IO COM 10 litel lite co	monweai <i>mplain</i> i, <i>arrest</i> v	natang appgang or Katang appgang or	oved D	isappro by the atlome	y for the Co	mmonwe	ekh prior	to filing. Pa.R.Crbn.P.507.)						
SDAG	HEATH	ER C	ASTE	LLINO				(Bignet	DOY Altor	ay for Co	d 1	ria Pron	2_	_		:	09/2	2/2020 (D4(e)
I, SPEC	IAL A	GENT	ROBE	ERT MO	HUGH			#516 @SP#	POETC - A	sskined A	ffent IO	Number & Badge #)						-
						eral and P	ennsylvan	a State	Police	<u>.</u>		•		PA	02224 Agency OF	OO U Numbi	·	-
do herei	by state	e: (ch	eck ap	proprie	te box)													
1. 🛛 1	accus	e the	above	named	defenda	nt who live	es at the ac	ldress s	et forth	abo	ve							
	accus	e the	defend	lant wh	ose name	e is unknov	wn to me b	ut who	is desc	cribec	las_							
	accus	e the	defend ane Do	lant wh	ose nam	e and popu	ılar design	ation or	nickna	ame i	s unk	mown to me and	lw b	nom I ha	ive the	refoi	e de	signated
					e Commo	onwealth o	f Pennsylv	ania at:	301 (Subdiv	Heion Co	νω <u>Ε</u>	PA DEPARTME BOAS STREET. Place-Political Subdivisi	HA	OF LAB RRISBI	OR & I JRG, F	NDL PA 17	STF 121	Y, 651

in DAUPHIN County

22 (County Code)

on or about JULY 2, 2020 TO AUGUST 6, 2020 (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

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA COUNTY OF: DAUPHIN VS. 12-3-04 Magisterial District Number: DEFENDANT (NAME and ADDRESS): MDJ Name; Hon. DOMINIC PELINO **JERMAINE PLUMER** Address: **576 EAST MAIN STREET** First Name Middle Name Gen. Last Name HUMMELSTOWN, PA SCI PHOENIX 17036 1200 MOKYCHIC ROAD COLLEGEVILLE, PA 19426 Telephone: (717) 583-1912 NCIC EXTRADITION CODE TYPE 5-Felony Pend. 1-Felony Full 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-Miademeanor Pending F-Misdemeanor Pending Extradition Determ. 4-Felony No Ext. B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION OTN/LiveScan Number Docket) Number Date Filed Complaint/incident Number Request Lab Services? 09/22/20 OCE-20-0052 ☐YES ⊠NO GENDER Co-Defendant(s) DOB 04/12/1981 POB Add'i DOB Maie First Name: Middle Name: Last Name: Gon AKA Female RACE ☐ White Asien ⊠ Black Native American Unknown ETHNICITY Hispanic Non-Hispanic Unknown HAIR COLOR ☐ GRY (Gray) ☑ BLK (Black) RED (Red / Aubn.) SDY (Sandy) BLU (Blue) PLE (Pumle) BRO (Brown) 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) WEIGHT (lbs.) DNA YES NO **DNA Location** UNKNOWN FBI Number **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** YES X NO 11 5 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration Sticker (MM/YY) Comm'l Veh. Ind. Plate # State Hazmat School Veh. Oth, NCIC Veh, Code Reg, same as Def. VIN Make Model Year Style Color П Office of the Attorney for the Commonwealth ⊠Approved □Disapproved because: <u>SDAG HEATHER CASTELLINO</u> I, SPECIAL AGENT ROBERT MCHUGH of the Pennsylvania Office of Attorney General and Pennsylvania State Police. A0222400 do hereby state: (check appropriate box) 1. X 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: PA DEPARTMENT OF LABOR & INDUSTRY, 651 301 BOAS STREET, HARRISBURG, PA 17121 (Subdivision Code)

in DAUPHIN County

22 (County Code) on or about JULY 1, 2020 TO SEPTEMBER 4, 2020

(Offense Date



	Docket Number:	Date Filed: 09/22/20	OTN/LiveScan Number		Complaint/incident Number OCE-20-0052
	Defendant Name	First: \ JERMAINE	Middle:		Last: PLUMER
app (Set f	propriate. When the orth a brief summary of the fact	ere is more than s sufficient to advise the	are described below with each none offense, each offense st defendent of the nature of the offense(s) charged. A collon(s) of the statute(s) or ordinance(s) allegedity	nould be numbered a citation to the statule(s) alleged	chronologically.
Inch	nose Attempt	8olicita 18 902 /		Number of Victims A	ge 80 or Older: 0
⊠ Lead	7 1 3921	(a) of t	ha Title 18 , PA Crimes Code	1 F2	
	Offense # Section	Subsection	PA Statute (Title)	Counts Grada NCIC	Offense Code UCR/NIBRS Code
	PennDOT Data (if applicable)	Accident Number	☐ Interstate	Safety Zone	☐ Work Zone
THE	atute Description (in FT BY UNLAWFUL ts of the accused a	TAKING OR DI			
ther dam PLU thro	eof. The Defendant of lage to property, hard JMER, and others on ugh the PA Department of funds.	commited the off Iship, suffering of his behalf, falsh	sed unlawful control over movablense during a Natural Disaster in or possible loss of life. TO WIT: ey filed applications for the Pand Industry website even though PI Conspiracy 18 903	volving a catastrophe During the COVID-1 emic Unemployment	which results in substantial 9 pandemic, Jermaine Assistance benefit program applicants did not qualify for
	2 3921 (a) of th		11 F2	Trans Code - MCDWIDDO Code
		ubsection	PA Statute (Title)	Counts Grade NCIC Of	fense Code UCR/NIBRS Code
	PennDOT Data (If applicable)	Accident Number	☐ Interstate	Safety Zone	☐ Work Zone
			e of statute or ordinance): JNLAWFUL TAKING OR DISPO	SITION	
The Or D	Disposition, Title 18 S	the intent of pro Section 3921(a),	his Offense: moting or facilitating the commis did agree with one or more other me or did agree to aid such other	persons that they or o	ne or more of them would



(n Docket	Numb	er: 1~20	Date File 09/22/20		OTN	/LiveSq	an Numb	867-	1				mplaint/In CE-20-0052	cident Number
,	Defen	dant N	ame	First: JERMAII	VE				Middle:				La PL	st: UMER	
app (Set f	ropriat onh a <i>briet</i>	te. W 'summai	hen the y of the facts	re is mo sufficient to a	re thar	ON e lefonde	offen:	se, each	offense sh	ould oitation	be nu	ımbei	ed chr	onologica	gedly violated, i illy. nore, is not aufficient. In a
inch Offe		<u> </u>	Attempt 18 901 A		Solicitat 18 902 /		Ø	Conapirac 18 903	,	Νι	ımber d	of Victi	ms Age (60 or Older	: 0
□ Lead		3	7512	13. 7		the			Crimes Co	de	3	F3			
	Offense		Section	Subsection		1	PA Statu	ite (Title)			Coun	ts Grad	e NCIC C	Mense Code	UCR/NIBRS Code
		DOT Da plicable			dent nber			☐ Int	eratate		□s	ařety Zo	ne		Work Zone
				clude th				or ordin	ance):						
In thany Conutili send	at the lecrime verime vertical Subtraction to the lection to the l	Defen which bstan ectror , date	dant, use constitu ce Drug, tic comm s of birth	tes a felo Device a nunication and soc	municating under and Coston through the coston thro	tion for this metion the thick the t	acility s title o c Act. he Dep number	to commi or under th TO WIT: artment o	ne act of Ap On three se f Correction ed to submi	ril 14 parat is SC	, 1972 te occa I Phoe	(P.L. sions nix el	233, No Jermai ectronic	n.64), knov ne PLUM messagin	mpt thereof of wn as the ER and others ag system to tent Assistance
lacho Offea		<u>i</u> —	ttempt 8 901 A		Solicitati 18 902 A	on		Conspiracy 18 903		Nur	nber o	Victin	s Age 6	0 or Older:	0
														, , , , , , , , , , , , , , , , , , ,	
 .ead?	4		3922	(a)(3)	of t	he	Title '	18, PA C	rimes Cod	8	1	F3			
	Offense			Subsection		F	A Statute	(Title)			Counts	Grade	NCIC Of	ense Code	UCR/NIBRS Code
		OT Dat		Accid Numi				☐ Inte	rstate		☐ Sa	ety Zor			Work Zone
			tion (inc E PTION	clude the	name	of s	tatute	or ordina	nce):						
Acts	of the	acci	used as	sociated	l with tl	nis O	ffense	:							
									rty of anoth						
															other state of
									ise shall no R and othei						at he did not
Iner	uplovni	y Pici	ssistanc	s ntOotan Stoiniae:	n throug	sh the	PA D	enartment	r and omei	nd Ind	quatro era ru	vu apj wehe	ite for P	FINER OF THE P	and others even
hou	sh PLU	MER	and the	other app	olicants	did n	ot qual	ify for the	e benefits. 🤇	Эп еа	ich app	licati	on, the	applicant i	nust certify the
									nt of Labor co-conspira			y sen	t a tota	l of \$18,26	54.00 of PUA
1, ,, ,1.	. hagad	A# ~ *													



															
C	ocket	Number 3	or: 27-24	Date File 09/22/20	d:	OTNI	ive.	Scan Number	7-1					Complain OCE-20-0	t/incident Number 052
[Defend	iant N	ame	First: JERMAIN	E				Middle:					ast: PLUMER	
appro (Set fort) summar	opriat h a <i>brief</i> y case, y	e, When an an an an an an an an an an an an an	nen thei of the facts ate the spec	re is more sufficient to ad tic section(s) a	e than Ivise the and subse	ONO C defendant o action(s) of t	offe of the	nse, each o nature of the offens tatute(s) or ordinanc	ffense sl =(8) charged,	Nould A altation	be nu	ımbere	d chro	onologic	gedly violated, i ally. more, is not sufficient. in a
Inchos Offens		1-	8 901 A		Solicita 18 902 /			Conspiracy 18 903		Nu	mber c	f Victim	s Age 6	0 or Olde	r: 0
□ Lead?		5	3922	(a)(3)	of	the	Titl	e 18 , PA C	rimes Co	de	1	F3			·
	Offense	#	Section	Subsection		P	A St	atute (Tille)			Coun	is Grade	NCIC O	ffense Code	UCR/NIBRS Code
	(If ap	DOT Dat plicable)	Accid Numb	per			☐ Inter			□ s	afety Zone	9	,	☐ Work Zone
				clude the Y THEF				te or ordina: ON	nce):						
intent mind; subsec Unem did no correc	ionall but d quentl ployn of qual ct. The	y crea ecepti y pref nent A lify fo	tes or re on as to orm the ssistanc the ber Departme	inforces a a person's promise. e progran efits. On	false intent TO We through the	impressition to /TT: Jesugh the applica	sion per rma PA tion	form a promi ine PLUMEI	alse impr se shall r R and oth of Labor nt must c	ession ot be i ers fal and In ertify (s as to inferre sely fi idustry the inf	law, vand from led an a websitormatic	alue, in the face applicate for l on they	ntention of the alone to ation for the PLUMER provide	or other state of that he did not the Pandemic R even though he d is true and
Inchoste Attempt Solicitation Conspiracy Offense 18 901 A 18 902 A 18 903 Number of Victims Age 60 or Older: 0						: 0									
 .ead?						of the							-		
	Offens	e#	Section	Subsectio	ıή		P/	A Statute (Title)	Counts	Grad	le NC	IC Offense	Code	UCF	R/NIBRS Code
		OT Data licable)		Accide Numbe				☐ intersi	tate		☐ Sat	fety Zone			☑ Work Zone
		•	,	lude the				e or ordinan se:	ce):	-					
· · ·															



Pocket Number:	Date Filed: 09/22/20	OTN/LiveScan Number	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.
- 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 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)	Oi .	(Signature of Affierit)
AND NOW, on this date, _ completed and verified. Ar	n affidavit of probable cause	t certify that the domplaint has been properly must be completed before a warrant can be issued.
12304		1/1491

Page 4 of 4

COMMONWEALTH OF PENNSYLVANIA

٧.

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 Johhny Thomas: "yea I got just acouple more including mines and!

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	•	US Bank Debit Cards Used for
	Amount	Payments (Last 4 Digits)
	7/3/20 - \$1,890.00	
Kareem Harper'el	7/9/20 - \$378.00	-
(a/k/a James Spencer)	7/13/20 - \$378.00	9072
xxx-xx-2453	7/20/20 - \$378.00	
-	7/27/20 - \$378.00	
	6/18/20 - \$2,430.00	,
	6/25/20 - \$203.00	
	7/2/20 - \$203.00	
Dominique McKinney	7/6/20 - \$203.00	
xxx-xx-6122	7/13/20 - \$203.00	9457
	7/20/20 - \$203.00	
	7/27/20 - \$203.00	
,	8/3/20 - \$203.00	
·	8/10/20 - \$203.00	
Jermaine Plumer	7/3/20 - \$3,675.00	
xxx-xx-8734	7/6/20 - \$175.00	6952
	7/13/20 - \$175.00	
	7/20/20 - \$175.00	
	7/27/20 - \$175.00	6952
	8/3/20 - \$175.00	
	8/10/20 - \$175.00	
Martez Windle	Unknown	5573
xxx-xx-2142		
	7/4/20 - \$94.00	
Franklin Johnson	7/10/20 - \$94.00	7037
xxx-xx-7318	7/13/20 - \$94.00	
	8/10/20 - \$731.00	
Jayver Perry	Unknown	0020
xxx-xx-9994		
	7/21/20 - \$195.00	
James Taylor	7/27/20 - \$195.00	4140
xxx-xx-2775	8/3/20 - \$195.00	
	8/12/20 - \$195.00	
Lawrence Jackson	7/8/20 - \$4,290.00	3157
xxx-xx-7982	7 ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
MAN IN 1702		

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.

Special Agent

Sworn to me and subscribed this _

Date (K)

, Magisterial District Judge

My commission expires first Monday of January,

2022

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA COUNTY OF: DAUPHIN VS. (NAME and ADDRESS): Magisterial District Number: 12-3-04 DEFENDANT: DOMINIC PELINO MDJ Name: Hon. RAFAEL RODRIGUEZ Α Address: **576 EAST MAIN STREET** Middle Name Last Name Gen. First Name HUMMELSTOWN, PA SCI PHOENIX 17036 1200 MOKYCHIC ROAD COLLEGEVILLE, PA 19426 (717) 583-1912 Telephone: NCIC EXTRADITION CODE TYPE C-Misdemeanor Surrounding States Distance: 5-Felony Pend. 🔀 1-Feiony Fuli O-Misdemeanor No Extradition 2-Felony Ltd. 6-Felony Pend, Extradilion Determ. A-Misdemeanor Full E-Misdemeanor Pending 3-Felony Surrounding Stetes F-Misdemeanor Pending Extradition Determ. 4-Felony No Ext. **B-Misdemeanor Limited** DEFENDANT IDENTIFICATION INFORMATION Date Filed Complaint/Incident Number Request Lab Services? OTN/LiveScan Number Docket Mumber OCÉ-20-0053 ☐YES ⊠NO 09/22/20 GENDER DOB 10/07/1989 Add'l DOB Co-Defendant(s) POB 🔀 Male Last Name: First Name: Middle Name: AKA Female RACE Mhite Asian Black Native American Unknown ETHNICITY Non-Hispanic Unknown Mispanic Hispanic BLU (Blue) HAIR COLOR SDY (Sandy) PLE (Purple) BRO (Brown) RED (Red / Aubn.) PLE (Purple) GRN (Green) GRY (Gray) WHI (White) BLK (Black) BLN (Blonde / Strawberry) PNK (Pink) XXX (Unk. / Bald) ONG (Orange) ☐ GRY (Gray) ☐ XXX (Unknown) **EYE COLOR** BLU (Blue) BRO (Brown) GRN (Green) MUL (Multicolored) GRN (Green) BLK (Black) PNK (Pink) HAZ (Hazei) MAR (Maroon) WEIGHT (lbs.) UNKNOWN DNA YES 🛛 NO **DNA Location MNU Number** Ft. HEIGHT In. FBI Number 6 1 Defendant Fingerprinted YES X NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration Sticker (MM/YY) Comm'l Veh. Ind. School Veh. Oth. NCIC Veh. Code Plate # State Hazmat Reg. same as Def. Color Model Style Make VIN Year Office of the Attorney for the Commonwealth Approved Disapproved because 09/22/2020 SDAG HEATHER CASTELLINO AGENT ROBERT MCHUGH Assigned Affigat 10 Number & Badge # of the Pennsylvania Office of Attorney General and Pennsylvania State Police, do hereby state: (check appropriate box) 1. X I accuse the above named defendant who lives at the address set forth above 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. PA DEPARTMENT OF LABOR & INDUSTRY, 651 with violating the penal laws of the Commonwealth of Pennsylvania at: SUI (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)



	Pocket	Number	" }~}\	Date 09/22	Filed: 2/20	٥	TN/LI	vesc 1/J	an Number						Comp OCE-		lincident Number 53	
	Defen	dant Na	ame	First: RAFA	\EL				Mic A	idle:	-				Last: RODF	RIGUE	Z	
app (Set fo	ropria _{rth a brief}	te. Wł summary	nen the	ere is i	MOFE at to advir	than c	ne of	ffens	se, each offe	nse sh	10U A cita	id be tion to the	numi	pered	chron	ologi	egedly violated, cally. Il more, le not sufficient, in	
Inch		<u> </u>	ttempt 8 901 A			olicitation 3 902 A	<u></u>		Conspiracy 18 903			Numbe	or of V	ictims /	Age 60	or Old	ler: 0	
⊠ Lead'	<u> </u>	1	392			of the			, PA Crimes (ode		1	F2					
	Offens		Section	Subse			PA SI	etute (Title)			Counts	Grad	e NCIC	Offense	Code	UCR/NIBRS Code	_
		DOT Dat opiicable			Acciden Number				☐ Interstat	•			Safet	/ Zone			☐ Work Zone	
						name R DISF			or ordinanc	e): 							-	
theredam ROI prog	eof. The age to DRIGU ram the qualify	e Defe proper EZ, ar rough for the	ndant ty, har id othe the PA ose fun	commi dship, ers on h Depar	ted the sufferi is beh tment	e offen ing or p alf, fal of Lab	se dur possib sley f por an	ring a de lo iled a d Inc	a Natural Disa ss of life. TO applications following the second of the s	aster in WIT: or the P	vol Du: Panc	ving a ring th demic	catas e CO Unen	trophe VID-1 aployi	which 19 pand nent A	resu lemic ssista		
Offen		<u> </u>	901 A	L	_	icitation 202 A		- N	Conspiracy 18 903		Nu	ımber d	of Victi	ms Ag	е 60 ог	Older	: 0	
Lead?		2	3921	(a)		of the	Title	18,	, PA Crimes C	ode		1	F2					
	Offense	# S	ection	Subsection	n		PA Sta	atute (1	Πtle)			Counts	Grade	NCIC O	ffense Co	de (UCR/NIBRS Code	
		OT Data olicable)		1	ccident umber				☐ Interstate			∏ Sa	ifety Zo	ne			Wark Zone	
									or ordinance TAKING OR		SIT	ION					•	
The Or Denga communithin div	Defendispositing in consister of the Constant	dant di ion, Ti onduct of suc County that the	d, with tle 18 which ch crim of Da ey, or c	the in Section constine or of uphin, lone or a	tent of 3921 tutes a fan att Montg	(a), did a crime tempt of comery of them	oting of agree or die or soli and H	or far e with d agricitati Berks ald er consp	cilitating the of th one or mor- ree to aid such ion to commit s, Pennsylvan	e other tother such c ia and c uct con	per pera rim else stit	sons to son or le, that where uting t	hat the person to is, defended the create th	ey or one one one or or or or or or or or or or or or or	one or the plant the time the time the time the time the the the the the the the the the th	more nning e fran ree w y un	ne above, vith other lawful taking,	



	Docket Numbe	" 	Date Filed: 09/22/20	OTN/Live	Scan Number	901-0)				plaint/inc -20-0053	ident Number
	Defendant Na	ame	First: RAFAEL			Middle:				Last: RODI	RIGUEZ	
app (Set (ropriate, Wh	en the	re is more th	an one offe he defendant of the	ense, each of the offer	offense sh nse(s) charged, A	ould I	be <mark>nu</mark> m	bered	chron	ological	edly violated, in ly. re, le not sufficient. In a
Inch Offe	<u> </u>	ttempt 8 901 A	Solid	ï	Conspiracy		Nur	mber of \	/ictims A	lge 60	or Older:	0
 Lead	3	7512	(a)	of the Tit	le 18 , PA (Crimes Co	de	3	F3			
	Offense #	Section	Subsection	PA S	tatute (Title)			Counts	Grade NO	CIC Offer	nse Code	UCR/NIBRS Code
	PennDOT Dat (if applicable)		Accident Number		☐ Inte	erstale		☐ Safe	ty Zone			Work Zone
			clude the na			ance):						
any Con utili send	crime which of troll Substance tized electronic names, dates	constitute Drug, ic comn of birth	tes a felony u Device and (nunications th	nder this title Cosmetic Act rough the De ccurity numb	e or under the t. TO WIT: epartment of ers to be use	e act of Apa On separate Correction ed to submit	ril 14, e occa is SCI	1972 (I sions, R Phoeni	P.L.233, Rafael A x electr	, No.6 ROI onic m	4), know DRIGUE: nessaging	Z and others
Incho Offen		tempt 901 A	Salici 18 90		Conspiracy 18 903		Num	iber of V	ictims A	ge 60 c	or Older: (o
 .ead?	4	3922	(a)(3). o	f the Title	e 18, PA Cı	rimes Code	9	1 F	-3			
			Subsection	PA Stat	tute (Title)			Counts G	irade NCI	C Offens	se Code I	UCR/NIBRS Code
	PennDOT Data (if applicable)		Accident Number		☐ inter	state		Safety	/ Zone			Work Zone
	ute Descript		clude the na	ne of statut	e or ordina	nce):						
Acts in the inten- mind subsection Uner	s of the accu at the Defendationally creates; but deception equently prefer aployment As though RODI	sed as ant did es or rei on as to orm the ssistance RIGUE	sociated with intentionally of inforces a fals a person's inte promise. TO	obtain or with e impression ention to perf WIT: Rafael ough the PA er applicants	hhold proper a, inlouding f form a prom I A. RODRI Department did not qual	alse impres ise shall no GUEZ and of Labor a ify for the b	sions t be in others nd Ind oenefit	as to law ferred for falsely lustry w ts. On e	w, value from the filed ap ebsite f each app	e, inter fact a oplicat or RO olication	ntion or o done that ions for t GRIGUI on, the ap	other state of the did not the Pandemic EZ and others oplicant must
22,	09.00 of PUA	funds	based off of t	he information	on provided	by Rodrigu	ez to	his co-c	onspira	tor(s).		



	Docket	Numbe)": }}	Date File 09/22/20	d:	OTNIL	ives	can Number	j-0					omplaint CE-20-00	/Incident Numbe)53	r
	Defend	lant Na	ame	First: RAFAEL					Middle: A					ast: ODRIGUE	≣Z	
app (Set fo	ropriat	e. Wh summary	en the	re is more sufficient to ed	e than Wise lite d	ONO O	ffen:	se, each o	ffense s e(s) charged	hould b Acitation to	e nun	bere	d chro	nologica	gedly violated, ally. nore, le not sufficient. In a	
inche		<u> </u> '	ttempt 8 801 A		Solicitat 18 902 A		×	Conspiracy 18 903		Nun	ber of	Victims	Age 6	or Older	: 0	
□ Lesd?		5	3922	(a)(3)	of	the	Γitle	18 , PA Cr	rimes C	ode	1	F3				
	Offense	#	Section	Subsection		P/	\ Slatı	ute (Title)			Counts	Grade	NCIC Of	ense Code	UCR/NIBRS Code	
	(If ap	DOT Dat piicable)		Accide Numb	er			Inters			☐ Safe	ty Zone			Work Zone	
				clude the Y - THEF				or ordinar N	nce):							
n then nind subscipand even s tru	at the I tionally t; but de equently emic U though e and c	Defend y create eception y pref Inemp n he di correct	lant did tes or re on as to form the loyment d not qu . The PA	inforces a a person's promise. : Assistanda alify for t	false intent TO W ce prophe ben nent of	tain or simpress tion to part to the part	with ion, perfo fael roug On ea and	hold proper inlouding form a promi A. RODRIC th the PA D ach applicat Industry ser	alse imposes se shall a GUEZ and epartmention, the	essions not be in d others at of Lab applican	as to la ferred falsel oor and t must	aw, va from y filed Indus certif	lue, in the fac l an app stry we y the i	tention o t alone the plication ebsite for nformation	r other state of nat he did not for the RODRIGUEZ on they provided	1
nchoa Offens	ļ		tempt 901 A	<u> </u>	olicitatio 8 902 A	on		Conspiracy 18 903		Numl	er of V	ictims.	Age 60	or Older:	0	
] ead?	Offens	e #	Section	Subsection		of the	PA S	Stalute (Tille)	Count	Grede	NCIC	Offense	Code	UCR	/NIBRS Code	
	PennD	OT Data cable		Accider Numbe	nt			☐ Interst			Safet				Work Zone	
								or ordinan	сө):							
Acts	of the	accu	sed ass	sociated v	with th	nis Offe	ense): 								



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

- 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 3
- 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.)

SEPTEMBER 22, 2020

(Magisterial District Court Number)

COURT COLOR

COMMONWEALTH OF PENNSYLVANIA

٧.

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 erned 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 ttyl 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.

Special Agent

Sworn to me and subscribed this day of day of Magisterial District Judge

My commission expires first Monday of January, _____



COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-3-04 VS. (NAME and ADDRESS): MDJ: Hon. Dominic A. Pelino BAKER Address: 576 East Main Street RONALD First Name Middle Name Last Name Ge Hummelstown, PA 17036 SCI Benner Township, 301 Institution Drive, Bellefonte, PA 16823 Telephone: (717)583-1912 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: ☐ 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited ☐ 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 Request Lab OTN/LiveScan Number Complaint/Incident Number Date Filed_ Docket Number Services? ☐ YES □ NO OCC-20-0020 Co-Defendant(s) ров Indiana GENDER Add'I DOB Gen. First Name Middle Name Last Name Male Male ☐ Female AKA White ■ White ■ New Tell NewTell New Tell New Tell New Tell New Tell New Unknown RACE Asian Black Native American ETHNICITY ☐ Hispanic Non-Hispanic Unknown BLU (Blue) ☐ PLE (Purple) BRO (Brown) SDY (Sandy) GRY (Gray) RED (Red/Aubn.) Hair GRN (Green) PNK (Pink) ☐ BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) Color BLN (Blonde / Strawberry) ☐ BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) BLK (Black) Eye M HAZ (Hazel) MAR (Maroon) PNK (Pink) XXX (Unknown) Color ☐ MUL (Multicolored) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO **FBI Number** 200 **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO 10 5 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh, Code Comm'l Veh. Reg. State Haz Registration Ind. same mat Plate # Sticker (MM/YY) as Def. П Model Style Color VIN Make Year 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). 09/22/2020 HEATHER A. CASTELLINO, SDAG (Name of the attorney for the Commonwealth) SPECIAL AGENT CHRISTOPHER WEAVER **BADGE #603** (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (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, (Place-Political Subdivision) 651 Boas St, Harrisburg, Pa on or about MARCH 12, 2020 TO AUGUST 31, 2020 in DAUPHIN County [22] (County Code)



	mber:	Date	Filed:	0.	N/LiveScan N	lumber	10	Complaint/Incide	AL COMPLAIN
	4	1	1					OCC-20-0020	
Defendant	Name:	First:	ALD		Middle: E		Last: BAKER		
When ther Set forth a be without more The age of the	e is more in the second representation representation representation repre	han one of of the facts lient. In a sui e time of the	offense, each sufficient to a mmary case, y offense may	th offense shidvise the defen ou must cite the be included if ki	ould be numl dant of the natu e specific sectio	pered chro re of the offe n(s) and sub n, social sect	nologically nse(s) charge section(s) of t urity numbers	d. A citation to the s he statute(s) or ordi and financial inforn	violated, if appropriat statute(s) allegedly violate inance(s) allegedly violate nation (e.g. PINs) should i
Inchoate Offense	Attemp		☐ Solicitati 18 902 A		onspiracy 3 903		Numbe	er of Victims Age 6	0 or Older
⊠ 1	392	<u> </u>	а	of the	TITLE 18	1	F2		
Lead? Offe	ense #	Section	Subsection	1	PA Statute (Tit	le) Cou	nts Grad	NCIC Offense Code	UCR/NIBRS Code
PennDO (if appli		Accident N	lumber			☐ Intersta	ite	☐ Safety Zone	☐ Work Zone
		nclude the	name of s	atute or ordi	nance): THEF	T BY UNLAV	VFUL TAKIN	G OR DISPOSITIO	ON .
									roperty of another, with t
nchoate Offense	☐ Attempt		☐ Solicitation		onspiracy 903		Numbe	r of Victims Age 60	or Older
□ 2	3921		а	of the	TITLE 18	1	F2		
ead? Offen	se#	Section	Subsection		PA Statute (Title	e) Coun	ts Grade	NCIC Offense Code	UCR/NIBRS Code
PennDO (if applic		Accident N	umber			☐ Interstat	e	☐ Safety Zone	☐ Work Zone
		clude the	name of st	atute or ordir	nance): CRIMI	NAL CONS	PIRACY		
	accused a	ssociated		fense: The De	fendant did. with				
neft by Unlav conduct whi dicitation to defendant did	wful Taking or ich constitute commit such agree with o	Disposition, a crime or crime, that is ther individua	did agree to a s, between Jur als that they, o	id such other pene of 2020 and sor one or more	d agree with one erson or persons September of 20 of them, would e	or more other in the planni 20, within the engage in con	er persons that ing or commis e County of Da aduct constitut	t they or one or mo sion of such crime of auphin, Centre, Pen ing the crime of the	or of an attempt or
neft by Unlav conduct whi dicitation to defendant did diation of Tit	wful Taking or ich constitute commit such agree with o	Disposition, s a crime or crime, that is ther individual pursuance of	did agree to a s, between Jur als that they, o	id such other period of 2020 and sor one or more acy one or more	d agree with one erson or persons September of 20 of them, would e	or more other in the planning of the planning	er persons that ing or commis e County of Di nduct constitut in violation of	t they or one or mo sion of such crime of auphin, Centre, Pen ing the crime of the	ore of them would engage or of an attempt or nsylvania and elsewhere, eft by unlawful taking, in Crimes Code, 18 Pa.C.S.
neft by Unlav conduct whi dicitation to defendant did plation of Tit 103.	vful Taking or ich constitute commit such agree with o le 18, and in	Disposition, s a crime or crime, that is ther individual pursuance of the crime of	did agree to a s, between Jur als that they, of such conspired	id such other period of 2020 and sor one or more acy one or more	d agree with one erson or persons September of 20 of them, would e overt acts were	or more other in the planning of the planning	er persons that ing or commis e County of Di nduct constitut in violation of	t they or one or mo sion of such crime of auphin, Centre, Pen- ing the crime of the Section 903 of the o	ore of them would engage or of an attempt or nsylvania and elsewhere, eft by unlawful taking, in Crimes Code, 18 Pa.C.S.
neft by Unlav conduct whi conduct whi dicitation to defendant did collection of Titions.	vful Taking or ich constitute commit such agree with o le 18, and in Attern 18 901	Disposition, s a crime or crime, that is ther individual pursuance of A	did agree to a s, between Jur als that they, of such conspired Solicitation 18 902 A a 3 Subsection	id such other period of 2020 and sor one or more acy one or more on the or more of the of the of the of the of the of the of the or other or of the or other or of the of the of the of the or other or o	d agree with one erson or persons September of 20 of them, would e overt acts were enspiracy	or more other in the planning the planning to the planning the planning to the planning the plan	er persons that ing or commis e County of Da induct constitut in violation of mber of Viction F3 nts Grade	t they or one or mo sion of such crime of suphin, Centre, Pen ing the crime of the Section 903 of the of ms Age 60 or Older	ore of them would engage or of an attempt or nsylvania and elsewhere, eft by unlawful taking, in Crimes Code, 18 Pa.C.S.
neft by Unlaw conduct while conduct while conduct while conduct while conduct of the conduct of	vful Taking or ich constitute commit such agree with o le 18, and in Attern 18 901 392 ense#	pt A Section Accider Number	did agree to a s, between Jur als that they, of such conspired 18 902 A a 3 Subsection 18 902 A	or of the	d agree with one erson or persons September of 20 of them, would end overtacts were enspiracy 903 TITLE 18 PA Statute (Title	or more other in the planning the planning to	er persons that ing or commis e County of Di induct constitut in violation of mber of Viction F3 Ints Grade ate	t they or one or mo sion of such crime of auphin, Centre, Pen- ing the crime of the Section 903 of the one ms Age 60 or Older	ore of them would engage or of an attempt or nsylvania and elsewhere, eft by unlawful taking, in Crimes Code, 18 Pa.C.S.
neft by Unlaw conduct while conduct while conduct while conduct while conduct of the conduct of	vful Taking or ich constitute commit such agree with o le 18, and in Attern 18 901 392 ense#	pt A Section Accider Number	did agree to a s, between Jur als that they, of such conspired 18 902 A a 3 Subsection 18 902 A	or of the	d agree with one erson or persons September of 20 of them, would end overt acts were enspiracy 903	or more other in the planning the planning to	er persons that ing or commis e County of Di induct constitut in violation of mber of Viction F3 ints Grade ate	t they or one or mo sion of such crime of suphin, Centre, Pen ing the crime of the Section 903 of the of ms Age 60 or Older	ore of them would engage or of an attempt or nsylvania and elsewhere, eft by unlawful taking, in Crimes Code, 18 Pa.C.S.
neft by Unlaw conduct whi conduct whi dicitation to defendant did plation of Tit 103. Inchoate Offense PennDO (if applicatute Description of the plate of the p	vful Taking or ich constitute commit such agree with o le 18, and in Attem 18 901 392 ense# T Data cable) cription (incommit such agree with o le 18, and in	pt A Section Accider Number	did agree to a s, between Jurals that they, of such conspiration 18 902 A a 3 Subsection 1 Sub	of the or ordinature or ordina	d agree with one erson or persons September of 20 of them, would end overtacts were enspiracy 903 TITLE 18 PA Statute (Title ance): THEFT	or more other in the planning t	er persons that ing or commisse County of Dinduct constitution of Market of Viction F3 The Grade Cate County of Dinduct constitution of Market of Viction of Market County Count	t they or one or mo sion of such crime of suphin, Centre, Pen ing the crime of the Section 903 of the of ms Age 60 or Older NCIC Offense	re of them would engage or of an attempt or nsylvania and elsewhere, eft by unlawful taking, in Crimes Code, 18 Pa.C.S. Code UCR/NIBRS Cod
neft by Unlaw conduct whi conduct whi dicitation to defendant did plation of Titions. Inchoate Offense PennDO (if applicatute Descriptions)	vful Taking or ich constitute commit such agree with o le 18, and in Attem 18 901 392 ense# T Data cable) cription (incommit such agree with o le 18, and in le 18, and	pt A Section Accider Number Clude the responsible to the responsible	did agree to a s, between Jurals that they, of such conspiration 18 902 A a 3 Subsection 1	of the on the or ordinates: The defe	d agree with one erson or persons September of 20 of them, would end overtacts were enspiracy 903 TITLE 18 PA Statute (Title ance): THEFT endant did intent in the deceiver price of the erson of the deceiver price of the endant did intent in the deceiver price of the erson of the endant did intent in the deceiver price of the erson of the e	or more other in the planning the planning to	er persons that ing or commisse County of Dinduct constitution of Market of Viction F3 The Grade attention of Grade attention of Market of Viction of Grade attention of Grade attention of Grade attention of Grade attention of Market of Viction of Grade attention of Grade attent	t they or one or mo sion of such crime of suphin, Centre, Pen ing the crime of the Section 903 of the of ms Age 60 or Older NCIC Offense Safety Zone	ore of them would engager of an attempt or insylvania and elsewhere eft by unlawful taking, in Crimes Code, 18 Pa.C.S.

Page 2 of 2*



	nber:	Date F	iled:	OTN/LiveScan	Numb			omplaint/Incident N CC-20-0020	umber
Defendant N	Name:	First:	D	Middle: E			Last: BAKER	00 20 0020	
Inchoate Offense	18 901 A	_	Solicitation 18 902 A	Conspiracy 18 903		Numbe	r of Victim	ns Age 60 or Older	
□ 4	3922		a 3	of the TITLE 18		1	F3		
		Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Co
PennDO (if appli		Accident Number				Interstate	- 1	☐ Safety Zone	☐ Work Zone
eft by Decep ree to aid su ne of 2020 a one or more	otion, did agree uch other perso and September e of them, wou	with one or in or persons of 2020, wit d engage in	more other pers in the planning hin the County o conduct constitu	se: The Defendant did, we constitute they or one or or commission of such crif Dauphin, Centre, Pennsting the crimes of theft by 903 of the Crimes Code,	more of the sylvania and the sylvania an	hem would f an attemp nd elsewhe ion in viola	engage in et or solicita ere, Defend	conduct which constitu ation to commit such cr lant did agree with othe	ites a crime or did ime, that is, betwee er individuals that th
Inchoate Offense	☐ Attemp		Solicitation 18 902 A	Conspiracy 18 903		Numbe	r of Victin	ns Age 60 or Older _	
				of the					1
_ead? Offe PennDO (if applie	T Data	Section Accident Number	Subsection	PA Statute (Counts	Grade	NCIC Offense Cod Safety Zone	UCR/NIBRS Co
arure Desc	cription (inci	ude the na	ame or statute	e or ordinance):				025/2)	
ots of the a	did, intentiona	lly receive, re	etain or dispose of	ee: RECEIVING STOLEN In the movable property of an apposed with intent to res	nother ki	owing that	it had bee	n stolen or believing th	at it has probably
cts of the a ne Defendant nen stolen, uni	did, intentiona	lly receive, ro	etain or dispose of	of movable property of ar	nother ki	owing that the owner,	it had bee	Age 60 or Older	at it has probably
ets of the a e Defendant en stolen, uni	did, intentionalless the proper	lly receive, rety is receive	etain or dispose of the control of t	of movable property of an approperty of an approper of the formal property of an approper of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of an appropriate property of appropriate property of a	nother kr	Number	it had bee	Age 60 or Older	
nchoate Offense ad? Offens PennDOT	did, intentionalless the proper Attempt 18 901 A se# Se Data	lly receive, rety is receive	etain or dispose of the control of t	of movable property of an sposed with intent to res	nother kr tore it to	Number of Counts	of Victims	Age 60 or Older	UCR/NIBRS Cod
nchoate Offense PennDOT (if applica	Attempt 18 901 A se# Se Data able)	ction Accident Number	Solicitation 18 902 A Subsection	of movable property of an approperty of an approper of the formal property of an approper of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of the formal property of an appropriate property of appropriate property of a	nother kr tore it to	Number	of Victims	Age 60 or Older	
nchoate Offense PennDOT (if applicatute Descriptions)	Attempt 18 901 A se# Se Data able)	ction Accident Number	Solicitation 18 902 A Subsection me of statute	Conspiracy 18 903 of the PA Statute (Ti	nother kr tore it to	Number of Counts	of Victims	Age 60 or Older	UCR/NIBRS Coo
nchoate Offense PennDOT (if applicatute Description	Attempt 18 901 A se# Se Data able)	ction Accident Number	Solicitation 18 902 A Subsection	Conspiracy 18 903 of the PA Statute (Ti	nother kr tore it to	Number of Counts	of Victims	Age 60 or Older	UCR/NIBRS Coo
nchoate Offense PennDOT (if applicatute Description	Attempt 18 901 A se# Se Data able)	ction Accident Number	Solicitation 18 902 A Subsection me of statute	Conspiracy 18 903 of the PA Statute (Ti	nother kr tore it to	Number of Counts	of Victims	Age 60 or Older	UCR/NIBRS Coo



Pocket Number:	Date Filed:	U9)5951-1 Number	Complaint/Incident Number OCC-20-0020	
Defendant Name:	First: RONALD	Middle;	Last: BAKER	

- 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 $\underline{1}$ through $\underline{20}$
- 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 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)

AND NOW, on this date

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

(Signature of Affiant)

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

(Magisterial District Court Number)

(Issuing Authority)



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



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

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



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

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



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

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.



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

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, Watsontown, 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 Watsontown, 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.

Page 7 of 20



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

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.



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

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



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

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

Page /2of 2 0



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

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

Page /3 of 20



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

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.



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

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.

Page 15 of 20



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



·Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020	
Defendant Name:	First: RONALD	Middle:	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, Watsontown, 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.



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



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



,			POL	ICE CRIMIN	AL COMPLAIN
Docket Number:	Date Filed:	OTN/LiveScan Num	ber	OCC-20-0020	nt Number
Defendant Name;	First: RONALD	Middle: E	Last: BAK		
SAY THAT THE FA OF MY KNOWLED I CERTIFY THAT I POLICY OF THE L	T CHRISTOPHER WEAVE ACTS SET FORTH IN THE GE, INFORMATION AND THIS FILING COMPLIES W INIFIED JUDICIAL SYSTE	FOREGOING AFFIDA BELIEF. WITH THE PROVISION OF PENNSYLVANIA	S OF THE CAS	E AND CORRECT EE RECORDS PUE IRE FILING CONF	TO THE BEST BLIC ACCESS IDENTIAL
INFORMATION AN	ID DOCUMENTS DIFFERE	ENTLY THAT NON-CC	DNFIDENTIALA	C C	DOCUMENTS.
Sworn to me and su	ubscribed before me this	day of	Septen	(Signature of Affi	2020
Mo . 10 a	rate (ires first Monday of Januar	WHEN_		Magisterial District	MHHAGA MILLOF PENNIN
in commission exp	neo mot wonday or oanda	',		11.	1.18.19

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA COUNTY OF: **DAUPHIN** VS. Magisterlai District Number: (NAME and ADDRESS): 12-3-04 DEFENDANT: DOMINIC PELINO MDJ Name: Hon. ANDREW LASHAWN SIMMS **576 EAST MAIN STREET** Address: Gen. Middle Name Last Name HUMMELSTOWN, PA First Name SCI PHOENIX 17036 1200 MOKYCHIC ROAD COLLEGEVILLE, PA 19426 (717) 583-1912 Telephone: NCIC EXTRADITION CODE TYPE C-Misdemeanor Surrounding States Distance; 🔯 1-Felony Full 5-Felony Pend. D-Misdemeanor No Extradition 6-Felony Pend. Extradition Datem. 2-Felony Ltd. 3-Felony Surrounding States A-Misdemeanor Full E-Misdemeanor Pending F-Misdemeanor Pending Extradition Determ. B-Misdemeanor Limited 4-Felony No Ext. DEFENDANT IDENTIFICATION INFORMATION Complaint/Incident Number Request Lab Services? OTN/LiveScan Nun Docket/Number Date Filed OCE-20-0030-3 ☐YES ⊠NO 09/22/20 GENDER Co-Defendant(s) DQB 03/19/1996 POB Add'l DOB **⊠** Male Middle Name: Last Name: Gen. First Name: AKA Female **⊠** Black Native American Unknown RACE ☐ White Asian Unknown ETHNICITY Non-Hispanic Hispanic BLU (Blue) PLE (Purple) BRO (Brown) HAIR COLOR \boxtimes RED (Red / Aubn.) SDY (Sandy) GRY (Gray) XXX (Unk, / Bald) PNK (Pink) ONG (Orange) GRN (Green) WHI (White) BLK (Black) BLN (Blonde / Strawberry) GRY (Gray) GRN (Green) BRO (Brown) **EYE COLOR** BLK (Black) BLU (Blue) XXX (Unknown) MUL (Multicolored) MAR (Maroon) PNK (Pink) HAZ (Hazel) WEIGHT (lbs.) UNKNOWN DNA YES X NO **DNA Location** Ft. HEIGHT In. MNU Number FBI Number 5 10 Defendant Fingerprinted YES 🛛 NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Registration Sticker (MM/YY) School Veh. Oth. NCIC Veh. Code Comm'l Veh. Ind. Plate # State Hazmat Reg. same as Def. Color Make Model Style VIN Year Office of the Altorney for the Commonwealth ☑Approved ☐Disapproved because: SDAG HEATHER CASTELLINO AGENT ROBERT MCHUGH of the Pennsylvania Office of Attorney General and Pennsylvania State Police, do hereby state: (check appropriate box) 1. X 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. **DEPARTMENT OF LABOR & INDUSTRY, 651** with violating the penal laws of the Commonwealth of Pennsylvania at:

in DAUPHIN County

22 (County Code) on or about JUNE 30, 2020 TO JULY 13, 2020 (Offense Date)

(Subdivision Code) BOAS STREET, HARRISBURG, PA 17121



	Docket	Number:		e Filed: 22/20	QTN	N/LiveScan Nomber							Complaint/Incident Number OCE-20-0030-3		
	Defendant Name First: ANDREW					Míddle: 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 nummary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.															
Inchoate Attempt Solicitation Conspiracy Offense 18 901 A 18 902 A 18 903 Number of Victims Age 60 or Older: 0															
⊠ Leed	? Offense		21 (a)	aection		Title 1	8 , PA Crimes (Code		1 Counts	F2 Grade	NCIC Of	fense Code	LICR/NIBRS Code	
		DOT Data		Accident Number			☐ Interstate			□s	Safety 2	one	-	☐ Work Zone	
							te or ordinance	e):							
The tow anot cata	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.														
Offer		18 901 /		Solicit 18 902		M	Conspiracy 18 903	<u> </u>	Num	ber o	f Victi	ns Age 6	0 or Older:	0	
 .ead1	Offense	2 392 ⁻	I(z-)			Title 1	B , PA Crimes (Code	1 Co		F2 Grade	NCIC Offen	se Code · U	CR/NIBRS Code	
PennDOT Data Accident (if applicable) Number Interstate Safety Zone Work Zone											/ork 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 nagge 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															



	Speket Number: Date Filed: 09/22/20				d:	O7N/LI	OTN/LiveScan Number						Complaint/Incident Number OCE-20-0030-3		
	Defend	lant Na	ame	First: ANDREW	/			Middle: LASHAWN				Lasi SIM	-	ndana di Sana da Sana da Sana da Sana da Sana da Sana da Sana da Sana da Sana da Sana da Sana da Sana da Sana	
app (Set fo	ropriat	e. Wh summary	nen thei of the facts	re is mor sufficient to a	re than dvise the de	one o fendant of	ffense, each	offense sh nse(s) charged. /	nould b A citation t	e nur	nbere	d chro	nologica	edly violated, lly. Iro, is not sufficient. In	
Inch Offe		<u>i</u> —	Attempt 8 901 A		Solicitation 18 902 A		Conspiracy 18 903		Number of V		Victim	ctims Age 60 or Older: 0			
☐ Lead	3 7512 (a) of ti				he -	Title 18 , PA (Crimes Co	de	1	F3					
	Offense	#	Section	Subsection		P/	A Statute (Title)			Counts	Grade	NOIC Of	ensa Code	UCR/NIBRS Code	
		DOT Da			rident mber		☐ Inters	tate		Safe	ty Zone			Work Zone	
				clude the			atute or ordina LITY	ance):							
In the any Concombirth	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 utilitized 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 Attempt Offense 18 901 A					Solicitation	n	Conspiracy		Number of Victims			Age 60	Age 60 or Older: 0		
							<u> </u>		<u> </u>						
□ Lead?	4		3922	(a)(3)	of th	e T	itle 18, PA C	rimes Coo	le	1	МЗ	***			
	Offense	#	Section S	Subsection		PA	Stetule (Tille)			Counts	Grade	NCIC Offe	nse Code	UCR/NIBRS Code	
PennDOT Data Accident (If applicable) Number Interstate Safet								- Safet	afety Zone						
Statute Description (include the name of statute or ordinance): ATTEMPT -THEFT BY DECEPTION															
The commender in the commend of the	Defend mission tention ind; bu	ant, w of tha ally cr dece	ith inten at crime, eates or otion as	in that he reinforce to a perso	mit theft e intenti es a false on's inte	by deconally impro- ntion t	ception, comm obtained or w ession, includin	ithheld pro ng false im omise shal	perty o pressio I not be	f anot ns as t infer	her by o law, red fro	decept value, on the f	ion. A per intention act alone	rson deceives in or other state that he did not	



	Docket	Number	524	Date File 09/22/20	d:	OTN/Li	yeSg	an Numbe	r 7-4	/					Complai OCE-20-0	nt/Incident Numbe 0030-3	
	Defend	ant Na	ame	First: ANDREW		***************************************	,		Midd	ile: HAWN					.ast: SIMMS		
appr (Set for	opriat	te, Wh	of the facts	e is more	e than (vise the def	one of	fens the nat	e, each d	offens se(s) che	e sho	uld be	e nur	nbere	d chr	onologic	egedly violated, cally. more, is not sufficient. In a	
Incho Offen			attempt 8 901 A		n	Conspiracy 18 903				Numi	ber of	Victim	s Age 6	30 or Old	er: O		
☐ Lead?		5	3922	(a)(3)	of t			18 , PA C	rimes	Cod		1	мз				
	Offense	# DOT Da	Section	Subsection Accie	dent	PA	Statut	e (Title)				Counts	Grade	NCIC O	ffense Code	UCR/NIBRS Code	
		plicable	-	Num			☐ Interstate] Safe	ty Zone		☐ Work Zone		
				clude the				or ordina I	nce):					_			
In the intenmind subset Unen	at the lationalle; but dequent aployed	Defend y create eception ly pref nent A	lant did tes or re- on as to orm the ssistance	inforces a a person's promise. e program	illy obtated false in tention TO WI through	in or voluments on to property of the property	vithh ion, i erfor irew PA D	old proper nicuding f m a prom SIMMS a epartment	false in ise should out the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of Land and the same indextile of the same	mpres all not hers fa bor a	sions a be inf ilsely f ad Indi	is to l ferrectiled a listry	law, va I from an app websi	alue, in the fa- lication te for	ntention ct alone n for the SIMMS	ves if he or other state of that he did not Pandemic even though he ed is true and	
Inchoa Offens		<u> </u>	tempt 901 A	j-	olicitation 8 902 A		<u> </u>	Conapiracy 18 903			Numb	er of \	/ictims	Age 6	0 or Olde	r: 0	
□ Lead?	Offens	ie #	Section	Subsection		f the	PA St	atute (Title)		ounts	Grade	NCIO	C Offense	e Code	uc	R/NIBRS Code	
PennDOT Data Accident (If applicable) Number								☐ Interstat					☐ Work Zone				
State	ite De	script	ion (inc	lude the	name o	of stat	ute c	or ordinar							_		
Acts	of the	accu	sed ass	ociated v	with thi	s Offe	nse:						1				



Docket Number:	Date Filed: 09/22/20	OTN/LiveScan Number	9r 9-4	Complaint/Incident Number OCE-20-0030-3
Defendant Name	First: ANDREW		Middle: LASHAWN	Last: SIMMS

- 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 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.)

COMMONWEALTH OF PENNSYLVANIA

٧.

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 Mokychic 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 and 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 Timonthy 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.

Special Agent

Sworn to me and subscribed this,

ノDate

, Magisterial District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COUNTY OF: DAUPHIN Magisteria! District Number: 12-3-04 VS. (NAME and ADDRESS): MDJ: Hon. Dominic A. Pelino BUTLER TODD Address: 576 East Main Street Middle Name First Name Hummelstown, PA 17036 SCI Benner Township, 301 Institution Drive, Bellefonte, PA 16823 Telephone: (717)583-1912 **NCIC Extradition Code Type** □ C-Misdemeanor Surrounding States □ 1-Felony Full ☐ 5-Felony Pending Extradition □ Distance: □ D-Misdemeanor No Extradition ☐ 6-Felony Pending Extradition Determ. 2-Felony Limited ☐ E-Misdemeanor Pending Extradition ☐ A-Misdemeanor Full ☐ 3-Felony Surrounding States ☐ F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab **Pate Filed** OTN/LiveScan Number Complaint/Incident Number **Docket Number** Services? ☐ YES 図 NO OCC-20-0020 Co-Defendant(s) \boxtimes GENDER ров Ра Add'I DOB Gen. Last Name First Name Middle Name Male Male ☐ Female AKA Unknown ☐ Asian Black ■ Native American RACE ETHNICITY Hispanic Non-Hispanic Unknown BRO (Brown) PLE (Purple) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) Hair PNK (Pink) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) BLK (Black) ONG (Orange) Color BLN (Blonde / Strawberry) GRN (Green) GRY (Gray) BRO (Brown) BLK (Black) BLU (Blue) Eye Color X HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) DNA YES NO **DNA Location FBI Number** 140 **MNU Number** Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☒ NO 8 Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth. NCIC Veh. Code Reg. State Haz Registration Comm'l Veh. School Veh. same Ind. mat Plate # Sticker (MM/YY) as Def. Color VIN Year Make Model Style 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). 09/22/2020 HEATHER A. CASTELLINO, SDAG (Name of the attorney for the Commonwealth) (Date) SPECIAL AGENT CHRISTOPHER WEAVER **BADGE #603** (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) 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. X 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 PA Dept Of Labor And Industry, with violating the penal laws of the Commonwealth of Pennsylvania at [301] Subdivision Code) (Place-Political Subdivision) 651 Boas St, Harrisburg, Pa on or about MARCH 12, 2020 TO AUGUST 31, 2020 in DAUPHIN County [22](County Code)

										POL			L COMPLAIN
Doc	ket Nu	mbe	ri .	Date /	Filed:	0	TN/LiveSca	n Nun	nber			nplaint/Incident C-20-0020	Number
Defe	ndant	Nam	e:	First:	`		Middle:			Last:			
3///	7,4 9,4) (9.5		TODE	,	*	A	_		BUTL	EK		
Whe (Set for withough The a	n ther orth a b ut more ge of th	e is i rief si , is no e vict	more the ummary ot suffici im at the	nan one of of the facts ent. In a su time of the	offense, ea sufficient to mmary case offense ma	ach offense sh advise the defen you must cite th	ould be nu dant of the n e specific sec nown. In addi	mber ature o tion(s) tion, so	ed chrono f the offense and subsec ocial security	logicall (s) charg tion(s) of number	y. jed. A the s s and	citation to the sta statute(s) or ordina financial informat	plated, if appropriate tute(s) allegedly violate nce(s) allegedly violate ion (e.g. PINs) should n
Inch Offe			Attempt 8 901 A		Solicita 18 902		onspiracy 3 903			Num	ber o	f Victims Age 60	or Older
\boxtimes	1		3921		а	of the	TITLE 18		1	F2			
Lead?		ense #		Section	Subsect	ion	PA Statute	(Title)	Counts	Gra	de	NCIC Offense Code	UCR/NIBRS Code
	nnDO appli		0.000	Accident N	lumber				Interstate			Safety Zone	☐ Work Zone
tatu	te De	scrip	tion (in	clude the	name of	statute or ordi	nance): TH	EFT BY	UNLAWFU	JL TAKI	NG O	R DISPOSITION	
offer	ise		ttempt 901 A		Solicitat	18	enspiracy 903		1		er of	Victims Age 60 o	r Older
ad?	2 Offens	0#	3921	ection	a Subsection	100	TITLE 18	ru-v	1	F2		NCIC Offense	
	nnDO		a	Accident Nu		, , , , , , , , , , , , , , , , , , ,	PA Statute (Counts	Grad		Code Safety Zone	UCR/NIBRS Code
	applic e Des					tatute or ordin	ance): CRI			ACY		Salety Zone	☐ Work Zone
eft by condi icitat fenda	Unlaw uct which ion to co ant did	ful Ta ch cor ommi agree	king or I stitutes t such cr with oth	Disposition, a crime or o ime, that is er individua	Title 18, Sed did agree to between Julis that they,	ction 3921(a), did aid such other pe ane of 2020 and 5 or one or more o	agree with o rson or perso september of of them, would	ne or n ns in th 2020, v d enga	nore other po ne planning o within the Co ge in conduc	ersons the or comminion of the ounty of the	at the ssion Dauph uting (ey or one or more of of such crime or o lin, Centre, Pennsy the crime of theft t	ission of the crime of of them would engage f an attempt or Ivania and elsewhere, by unlawful taking, in nes Code, 18 Pa.C.S.
ncho Offe			Attempt 18 901 A		Solicitat 18 902 A		nspiracy 903		Numbe	r of Vict	ims A	age 60 or Older	
	3		3922	and the same of the	a 3	THE R. P. LEWIS CO., LANSING, MICH.	TITLE 18		1	F3			
ad?	Offe nnDO	nse#		Section Accident	Subsect	tion	PA Statute (_	Counts	Grad		NCIC Offense Co	
	Desc			Number ude the n		– atute or ordina	ance): THEF		Interstate ECEPTION	los es		Safety Zone	☐ Work Zone
eives	if he/si	ne inte	entionally	fails to cor	rect a false	fense: The defe impression which or confidential rela	the deceiver	entiona previou	lly obtains or sly created o	withhole or reinfor	d prop	perty of another by or which the deceiv	deception. A person ver knows to be

Docket N	lumb	er:	Date (Filed:	O	TN/LiveScan	Numl	per	Print I	OL	Com	CRIVINAL plaint/Incident N C-20-0020		
Defenda	nt Na	me:	First: TODD			Middle:				₋ast: 3UTI	.ER			
												ı		
Inchoat Offense		Attempt 18 901 A		Solicitation 18 902 A		Conspiracy 8 903		N	lumber	of Vi	ctims	Age 60 or Older _		
	4	3922		a 3	of the	TITLE 18		1		F3	,			
Penn		Data	Accident	Subsection		PA Statute (T		Co Inter	ounts	Gr	ade	NCIC Offense Cod	e UCR/NIBRS ☐ Work Zo	
(if ap			Number	name of statu								J Galety Zone	LI WORK ZO	110
gree to aid une of 202 or one or m	d such 20 and nore of	other person September of them, would	n or person of 2020, wi d engage ir	s in the planning thin the County of	or commin of Dauphin uting the c	ssion of such cri , Centre, Pennsy rimes of theft by	me or or or or or or or or or or or or or	of an a and e otion in	attempt Isewher n violati	or so	licitatio fendan	nduct which constituen to commit such or to did agree with other standing pursuance	rime, that is, betw er individuals that	veen t the
Inchoate Offense	THE RESERVE TO SERVE THE PARTY OF THE PARTY	18 901 A		Solicitation 18 902 A		Conspiracy 8 903	1	N	lumber	of Vi	ctims	Age 60 or Older _		
	5	3925		a	of the	TITLE 18		1		F3				
Penni (if ap		Data	Acciden Number			PA Statute (ounts rstate	G	rade	NCIC Offense Cod Safety Zone	UCR/NIBRS Work Zo	
cts of the	e acc	cused asso	ociated w		se: The D	efendant did, int	ention	ally re	ceive, r	etain	or disp	ose of movable prop d, or disposed with i		t to
Inchoate Offense		Attempt 18 901 A]E	Solicitation 18 902 A		nspiracy 903		Nu	mber o	f Vict	ims A	ge 60 or Older		
		1			of the									
	ffense		ction	Subsection		PA Statute (Titl	e)	Cou	nts	Grad	ie	NCIC Offense Code	UCR/NIBRS C	ode
PennD (if app			Accident Number					Inters	tate			Safety Zone	☐ Work Zon	e
tatute De	escrip	otion (inclu		ame of statute		nance):								
cts of the	e acc	used asso	ciated w	ith this Offens	e:									



Docket Number:	Pate Filed:	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0020	
Defendant Name:	First: TODD	Middle:	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.
- 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 20
- 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 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)

AND NOW, on this date

17670

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

(Signature of Affiant)

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

(Magisterial District Court Number)

(Issuing Authority)



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

ARC 4446 BAL 07/10



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



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

Page 7 of 20



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/incident Number OCC-20-0020
Defendant Name:	First: TODD	Middle:	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.

Page 8 of 20



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

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, Watsontown, 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 Watsontown, 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.

AOPC 412A - Rev. 7/18 Page 9 of 20



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

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.

Page 1 of 20



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

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

Page // of 20



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

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 \$14-826-8555. Zonge stated that he had made arrangements



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

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

Page 1.3 of 20



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

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.

AOPC 412A – Rev. 7/18
Page 1/9 of 20



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

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.

Page <u>5</u> of <u>20</u>



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

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 prepaid 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



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

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, Watsontown, 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.

Page 7 of 20



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

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

Page/ 8 of 26



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

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.



			PO	LICE CRIM	IINAL COMPLAIN
Dacket Number:	Date Filed:	191595 The Scan Num	ber	Complaint/In OCC-20-00	cident Number 20
Defendant Name:	First: TODD	Middle:	Las BU	t: TLER	
SAY THAT THE F OF MY KNOWLE I CERTIFY THAT POLICY OF THE	FACTS SET FORTH I DGE, INFORMATION THIS FILING COMPI UNIFIED JUDICIAL S	VEAVER, BEING DULY SWO IN THE FOREGOING AFFIDA N AND BELIEF. LIES WITH THE PROVISIONS SYSTEM OF PENNSYLVANIA IFFERENTLY THAT NON-CO	S OF THE CA A THAT REQU	JE AND CORR SE RECORDS JIRE FILING CO	ECT TO THE BEST PUBLIC ACCESS ONFIDENTIAL
INFORMATION A	ND DOGO, NENTS DI	IFFERENCE MAT NON-OC			W
4/4/20	subscribed before me	JM.	Suple	(Signature of	2020
My commission ex	pires first Monday of	January, 2022		100 ×	

POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA COMMONWEALTH OF PENNSYLVANIA **DAUPHIN** COUNTY OF: VS. (NAME and ADDRESS): Magisterial District Number: 12-3-04 DEFENDANT: DOMINIC PELINO WASHINGTON MDJ Name: Hon. **DWAYNE 576 EAST MAIN STREET** Address: Свл. Last Name First Name Middle Name HUMMELSTOWN, PA SCI PHOENIX 17036 1200 MOKYCHIC ROAD COLLEGEVILLE, PA 19426 (717) 583-1912 Telephone: NCIC EXTRADITION CODE TYPE C-Misdemeanor Surrounding States 1-Felony Fuli Distance: 5-Felony Pend. D-Misdemeanor No Extradition 6-Felony Pend. Extradition Determ. 2-Felony Ltd. E-Misdemeanor Pending 3-Feiony Surrounding States A-Misdemeanor Full F-Misdemeanor Pending Extradition Determ. B-Misdemeanor Limited 4-Felony No Ext. DEFENDANT IDENTIFICATION INFORMATION Request Lab Services? Complaint/Incident Number Date Filed OTN/LiveScan Number Docket/Number YES NO OCE-20-0029 09/22/20 Co-Defendant(s) GENDER DOB 09/22/1993 POB Add'l DOB Male Female Gen Middle Neme: Last Name: First Name: AKA Unknown Native American RACE White Asian 🗌 Non-Hispanic Unknown ETHNICITY Hispanic BRO (Brown) HAIR COLOR GRY (Gray) SDY (Sandy) BLU (Blue) PLE (Pumle) RED (Red / Aubn.) GRN (Green) PNK (Pink) XXX (Unk. / Bald) BLK (Black) ONG (Orange) WHI (White) BLN (Blonde / Strawberry) GRY (Gray) BRO (Brown) GRN (Green) BLU (Blue) **EYE COLOR** BLK (Black) XXX (Unknown) HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) WEIGHT (lbs.) UNKNOWN **DNA Location** DNA] yes 🛛 no Ft. HEIGHT In. MNU Number **FBI Number** 6 0 YES 🛛 NO Defendant Fingerprinted Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Comm'l Veh. Ind. School Veh. Oth, NCIC Veh. Code Plate # Hazmat Registration Sticker (MM/YY) State Reg. Ш same as Def. Color Model Style VIN Year Make Office of the Attorney for the Commonwealth Approved Disapproved because: SDAG HEATHER CASTELLINO I, <u>SPECIAL AGENT ROBERT MCHUGH</u> APOETC - Assigned Affant IO Number & Section of of the Pennsylvania Office of Attorney General and Pennsylvania State Police. PA0222400 do hereby state: (check appropriate box) 1. X I accuse the above named defendant who lives at the address set forth above l 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. PA DEPARTMENT OF LABOR & INDUSTRY, 651 with violating the penal laws of the Commonwealth of Pennsylvania at: BOAS STREET, HARRISBURG, PA 17121 (Place-Politicel Subdivision) (Subdivision Code)

in DAUPHIN County

<u>22</u> (Counly Code) on or about JULY 7, 2020 TO AUGUST 5, 2020



Pq	ocket N	lumber	170	Date File 09/22/20	d:	OTN/Liv	veScan Number	6-4					ompiair CE-20-0	Wincident Number 029
De	efenda	ant Na	me	First: DWAYNE				Middle:	v			_	ast: /ASHING	TON
appri	opriat h <i>a brief</i>	te. Wh	nen the	ere is mo a sufficient to	ore than	ONE O	ffense, each	offense : ense(s) charge	should d. A citati	ld be no tion to the s	umbe	red chr	onolog	legedly violated, ically. ut more, le not sufficient. In a
Offens		ŗ	Attempt 18 901 A		Solicita 18 902 /		Conspirace 18 903	ý	١	Number	of Vict	ims Age	60 or Ol	der: 0
⊠ Lead?		1_	3921	(a)	of t	he Titl	le 18 , PA Crin	nes Code		1	F2			
	Offens	e #	Section	Subsectio	n	PA S	tatute (Title)			Counts	Grade	NCIC Offe	nse Code	UCR/NIBRS Code
		nDOT Da pplicable			ccident umber		☐ Inter	state		□ s:	afety Zo	ne		☐ Work Zone
Stat	ute D	escrip UNL	otion (i	nclude th	ne nam	e of sta	atute or ordir	ance):	•		····			·
Acte														
thered dama WAS	Defend of. The ge to p HINC am the	dant une Defe proper	nlawful endant o ty, hard and ot	ly took o commited Iship, suf hers on h	r exerci I the off fering o is behal	fense du or possil lf, falsle	iring a Natural ble loss of life by filed an app	Disaster TO WIT Lication for	involv f: Dur or the l	ving a c ring the Panden	atastro COV nic Ur	ophe wh ID-19 pa nemploy	ich resu andemic ment A	t to deprive him lits in substantial c, Dwayne ssistance benefit qualify for those
The I thered dama WAS progr	Defendence of The ge to place the HINC arm the te	dant under Defendent under Defendent under Defendent und defendent und defendent und defendent und defendent under Defendent und defendent under Defendent under Defendent und defendent under Defendent under Defendent und defendent under Defendent und defendent under Defendent und d	nlawful endant o ty, hard and ot	ly took o commited Iship, suf hers on h	r exerci I the off fering o is behal	fense du or possil If, falsle Labor ar	iring a Natural ble loss of life by filed an app	Disaster TO WIT Lication for	involv F: Dur or the I n thou	ving a c ring the Panden igh WA	atastro COV nic Ur SHIN	ophe wh ID-19 pa nemploy	andemic ment A did not	olts in substantial c, Dwayne ssistance benefit qualify for those
The I thered dama WAS progr funds	Defendence of The ge to place the HINC arm the te	dant une Deference of TON, rough	nlawful endant of ty, hard , and ot the PA	ly took o commited Iship, suf hers on h	r exerci I the off fering c is behal ent of I	fense du or possil If, falsle Labor ar	uring a Natural ble loss of life by filed an app and Industry we Conepiracy	Disaster TO WIT lication for	involver: Dur or the land thou	ving a c ring the Panden gh WA	atastro COV nic Ur SHIN	ophe wh ID-19 pa nemploy IGTON	andemic ment A did not	olts in substantial c, Dwayne ssistance benefit qualify for those
The I thereo dama WAS progr funds Inchose	Defendence of The ge to place the HINC arm the te	dant use Defe proper TON rough	nlawful endant of ty, hard , and of the PA	ly took o commited Iship, suf hers on h Departm	r exerci I the off fering c is behal ent of I Solicitation	fense du or possil lf, falsle Labor ar	uring a Natural ble loss of life by filed an appind Industry we Conepiracy	Disaster TO WIT lication for	involve: Dur or the land thou	ving a cring the Panden egh WA	atastro COV nic Ur SHIN	ophe wh ID-19 pa nemploy IGTON	aich resu andemie ment A did not	olts in substantial c, Dwayne ssistance benefit qualify for those
The I thereo dama WAS progr funds Inchose	Defended of The geto HINC am the comments of the period of	dant use Defe proper TON rough	nlawful endant of ty, hard , and ot the PA ttempt a 901 A	ly took of committee liship, sufficient on his Department of the committee	r exerci I the off fering c is behal ent of I Solicitation	fense du or possil lf, falsle Labor ar	uring a Natural ble loss of life by filed an appind Industry we Conepiracy 18 903	Disaster TO WIT lication for bisite ever	involve: Dur or the land thou	ving a cring the Panden egh WA	catastre COV nic Ur SHIN Victim	ophe wh ID-19 pa nemploy GTON	andemic ment A did not ar Olde	olts in substantial c. Dwayne ssistance benefit qualify for those
The I thereo dama WAS progr funds Inchos Offense	Offense Offense Offense (if ap	dant ule Defe proper TON rough	nlawful endant of ty, hard , and of the PA ttempt 3921 Section S a	ly took of committee diship, sufficient to the committee diship, sufficient to the committee diship, sufficient to the committee diship, sufficient to the committee diship to	r exerci I the off I the off I fering c is beha ent of I Solicitati 18 902 A of the	on Title	pring a Natural ble loss of life by filed an append Industry we leave the second secon	Disaster TO WIT lication for bisite ever	involve: Dur or the land thou	ving a cring the Panden egh WA	catastre COV nic Ur SHIN Victim	ophe wh ID-19 pa nemploy GTON	andemic ment A did not ar Olde	olts in substantial c., Dwayne ssistance benefit qualify for those



	Docket Number:	Date Filed: 09/22/20	OTN/LkgeScan Number	4		Complaint/Incident Number OCE-20-0029
	Defendant Name	First: DWAYNE		Middle:		Last: WASHINGTON
apı (Set	propriate, When th forth a <i>brief</i> summary of the fac	ere is more tha	an one offense, each	offense should ense(s) charged. A citation	be numbered of	statute allegedly violated, hronologically. violated, without more, is not sufficient. in a
1	hoate Attempt ense 18 901 A	Solici 18 902	tation Conspired 2 A 18 903	y Nu	ımber of Victims A	ge 60 or Older: 0
☐ Lead			of the Title 18, PA	Crimes Code	1 F3	
	Offense # Section PennDOT Data	Subsection Accident	PA Statute (Title)		Counts Grade NC	C Offense Code UCR/NIBRS Code
	(if applicable)	Number	☐ (Inter	state	Safety Zone	☐ Work Zone
	atute Description (me of statute or ordir	ance):		
any Cor con birt	orime which constituted represented the constitution of the consti	tutes a felony ung, Device and C h the Departmen numbers to be to	nder this title or under to cosmetic Act. TO WIT nt of Corrections SCI P used to submit fraudule	he act of April 14 Dwayne WASH hoenix electronic	, 1972 (P.L.233, UNGTON and of messaging syste	on or the attempt thereof of No.64), known as the hers utilitized electronic m to send names, dates of stance applications on the
	oate	Solicite	ation Conspiracy			
Offe	nse 18 901 A	18 902		Nu	mber of Victims Ag	e 60 or Older: 0
	nse 18 901 A	1-		Nu	mber of Victims Ag	e 60 or Older: 0
Offe	i I	18 902		Nu	mber of Victims Ag	e 60 or Oider: 0
	17 4 3922 Offense # Section	(a)(3) of Subsection	A 18 903	Nu		
	4 3922	(a)(3) of	A 18 903	Frimes Code	1 F3	
Lead	Offense # Section PennDOT Data (if applicable)	(a)(3) of Subsection Accident Number nclude the nam	A 18 903 Title 18, PA C PA Statute (Title)	crimes Code	1 F3 Counts Grade NCIC	Offense Code UCR/NIBRS Code



	Docker Num	الراب المالية	Date Files 09/22/20	d: OTN	/LiveScap Numbe	1)-4	/			omplaint/i	ncident Number 9
	Defendant	Name	First: DWAYNE		<u> </u>	Middle				ast: /ASHINGT(ON
appr (Set for	opriate. V th a brief summ ry case, you mu	Vhen ther ary of the facts	e is more sufficient to ad- fic section(s) a	e than one vise the defendan	escribed below offense, each of the nature of the offer of the statute(s) or ordinar Conspiracy	offense : 180(8) charge	should be d. A citation to t ly violaled.	numbere	d chro	riologicali ted, without mor	y. e, is not sufficient. In a
Offen	8.0	18 901 A	i	18 902 A	18 903		- Nullin	OF OI VICINI	a Age of	o or Older.	
□ Lead?	5	3922	(a)(3)	of the	Title 18 , PA C	rimes C	ode	1 F3			
	Offense #	Section	Subsection		PA Statute (Title)			Counts Grade	NCIC Off	lense Code	UCR/NIBRS Code
	PennDOT (if applica		Acck Num		☐ Interat	ate		Safety Zone			Work Zone
				name of s	statute or ordina	nce);					
mind subse Pand WAS inform	; but decep equently pr emic Unen HINGTO	otion as to reform the apployment of even the gyprovided	a person's promise. Assistant ugh he di l is true an	intention to TO WIT: I ce program d not qualif ad correct. I	ession, inlouding o perform a promotion perform a promotion washing through the PA I by for the benefits The PA Department	ise shall NGTON Departme . On eac	not be inf and others ont of Labo h applicat	erred from falsely file or and Indu ion, the ap	the fac ed an a stry we plicant	t alone that pplication obsite for must certi	t he did not for the fy the
inchoa Offens	··	Attempt 18 901 A		olicitation 8 902 A	Conspiracy		Numbe	er of Victims	Age 60	or Older: 0)
Lead?	Offense #	Section	Subsection	of the		Cour	ls Grade	NCIC Offense	Code	LICR/N	IBRS Code
	PennDOT D		Accide		7, () () () () ()	1		11010 01101101			1
	(if appilcab	le)	Numb	er	[Intersta	te		Safety Zone	1	□ v	Vork Zone
State	ite Descri	iption (inc	lude the	name of st	tatute or ordina	nce):					
Acts	of the ac	cused ass	sociated v	with this O	ffense:	,					



Pocket Number:	Date Filed:) 09/22/20	OTN/LiveScan Number	0-4	Complaint/incident Number OCE-20-0029
Defendant Name	First: DWAYNE	•	Middle:	Last: WASHINGTON

- 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 3
- 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.)

SEPTEMBER 22, 2020 (Date)

(Magisterial District Court Number)

.

COMMONWEALTH OF PENNSYLVANIA

٧.

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 whis 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 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, 2002, 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.

Special Agent

My commission expires first Monday of January, 2022