

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-2-04

MDJ: Hon. Sonya M. McKnight

Address: 1805 North Cameron St.
Harrisburg, PA 17103

Telephone: (717)233-3599

POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

(NAME and ADDRESS):

ROBERT

PALMER

First Name

Middle Name

Last Name

Ge
nSCI HUNTINGDON, 1100 Pile Street
HUNTINGDON, PA 16654

NCIC Extradition Code Type

- ☒ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States
☐ 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

☐ Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number

CH-11-21

Date Filed

1/20/21

OTN/LiveScan Number

K102935-0

Complaint/Incident Number

OCC-20-0025

Request Lab
Services?☐ YES ☒ NO

GENDER

DOB 10/29/1991

POB Pa

Add'l DOB

/ /

Co-Defendant(s) ☒☒ Male

First Name

Middle Name

Last Name

Gen.

☐ Female

AKA

RACE

☐ White☐ Asian☒ Black☐ Native American☐ Unknown

ETHNICITY

☐ Hispanic☒ Non-Hispanic☐ UnknownHair
Color☐ GRY (Gray)☐ RED (Red/Aubn.)☐ SDY (Sandy)☐ BLU (Blue)☐ PLE (Purple)☐ BRO (Brown)☒ BLK (Black)☐ ONG (Orange)☐ WHI (White)☐ XXX (Unk./Bald)☐ GRN (Green)☐ PNK (Pink)☐ BLN (Blonde / Strawberry)Eye
Color☐ BLK (Black)☐ BLU (Blue)☒ BRO (Brown)☐ GRN (Green)☐ GRY (Gray)☐ HAZ (Hazel)☐ MAR (Maroon)☐ PNK (Pink)☐ MUL (Multicolored)☐ XXX (Unknown)

DNA

☐ YES ☐ NO

DNA Location

FBI Number

MNU Number

WEIGHT (lbs.)

180

Defendant Fingerprinted

☐ YES ☒ NO

Ft. HEIGHT In.

Fingerprint Classification:

5

11

DEFENDANT VEHICLE INFORMATION

Plate #

State

Haz
mat
☐

Registration

Sticker (MM/YY) /

Comm'l Veh.

Ind. ☐

School Veh.

☐

Oth. NCIC Veh. Code

Reg.
same
as Def.
☐

VIN

Year

Make

Model

Style

Color

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

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

HEATHER A. CASTELLINO, SDAG

(Name of the attorney for the Commonwealth)

APPROVED ELECTRONICALLY

(Signature of the attorney for the Commonwealth)

1/15/2021

(Date)

I, SA CHRIS WEAVER/SA KATIE GRADY

(Name of the Affiant)

BADGE #603/BADGE #590

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

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

with violating the penal laws of the Commonwealth of Pennsylvania at [301] PA Dept Of Labor And Industry,

651 Boas St, Harrisburg, Pa

(Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

on or about JUNE 11, 2020 TO SEPTEMBER 1, 2020

(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: Cr-1/-21	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number OCC-20-0025
Defendant Name:	First: ROBERT	Middle:	Last: PALMER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	911	b 3	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense: The Defendant did, being employed by or associated with an enterprise, did between June of 2020 and September of 2020, within the Counties of Dauphin, Huntingdon, Cambria, Pennsylvania and elsewhere, conduct or participate, directly or indirectly in the conduct of such enterprise's affairs through a pattern of racketeering activity, that is, during the periods as set forth herein. Defendant was associated with an enterprise constituting a group of individuals associated in fact, although not a legal entity, engaged in commerce and consisting of Elise J. Ballard, and others, and Defendant did conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. §911(h) consisting of (See Continuation of Offenses)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	911	b 4	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense: The Defendant did, did between June of 2020 and September of 2020, within the Counties of Dauphin, Huntingdon, Cambria, Pennsylvania and elsewhere, conspired to violate the provisions of Section 911(b)(3) of the Crimes Code, 18 Pa.C.S. §911(b)(3), pertaining to Corrupt Organizations, that is, during the periods as set forth herein, Defendant, with the intent of promoting or facilitating the commission of the crime of Corrupt Organizations, did conspire and agree with other individuals, that they, or one or more of them, while employed by or associated with the enterprise set forth herein, would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity as defined in 18 Pa.C.S. §911(h), in violation of Section 911(b)(4) of the Crimes Code, 18 Pa.C.S. §911(b)(4).

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	3921	a	of the	TITLE 18	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

Acts of the accused associated with this Offense: The Defendant, took or exercised unlawful control over movable property of another, with the 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.

**POLICE CRIMINAL COMPLAINT**

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Defendant Name:	First: ROBERT	Middle:	Last: PALMER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	4	3921	a	of the	TITLE 18	1	F2		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

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 Counties of Dauphin, Huntingdon, Cambria, Pennsylvania and elsewhere, Defendant did agree with other individuals that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed, in violation of Section 903 of the Crimes Code, 18 Pa.C.S. §903.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	5	3922	a 3	of the	TITLE 18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	6	3922	a 3	of the	TITLE 18	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			

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, Title 18, Section 3922(a)(3), 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 Counties of Dauphin, Huntingdon, Cambria, 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 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.



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Defendant Name:	First: ROBERT	Middle:	Last: PALMER

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	3925	a	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

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

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	8	7512	a	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **CRIMINAL USE OF A COMMUNICATION FACILITY**

Acts of the accused associated with this Offense: In that the above named defendant did, on or about the above mentioned date and time use a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime under this title or under the PA Controlled Substance, Drug, Device and Cosmetic Act 64-1972, all of which is in violation of the Title 18 PA CS §7512.

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

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

Acts of the accused associated with this Offense:



**POLICE CRIMINAL COMPLAINT
OFFENSE CONTINUATION PAGE**

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Defendant Name:	First: ROBERT	Middle:	Last: PALMER

OFFENSE DESCRIPTION CONTINUATION

Offense # 1:

A. Multiple acts of Criminal Conspiracy to commit violations of the Chapter 39 of the Pennsylvania Crimes Code, 18 Pa.C.S.A. §903,

A. Multiple acts of violation of the Chapter 49 of the Pennsylvania Crimes Code, including 18 Pa. C.S. A. §4911,

B. 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. §911(b)(3).



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: ROBERT	Middle:	Last: PALMER

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 13.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

(Date)

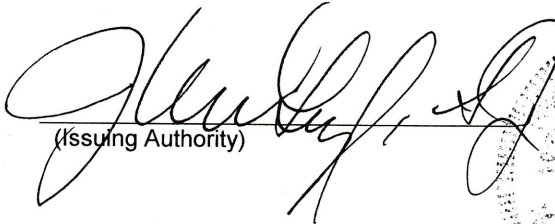
(Year)

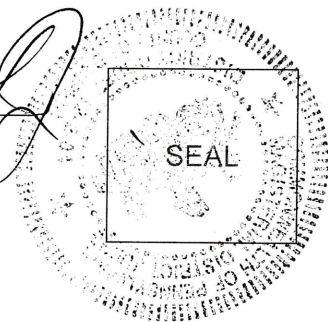

(Signature of Affiant)

AND NOW, on this date 1-20-21 I certify that the complaint has been properly completed and verified.

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

12-2-04
(Magisterial District Court Number)


(Issuing Authority)





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Defendant Name:	First: ROBERT	Middle:	Last: PALMER

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 to 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.

In June of 2020 the Department of Correction identified possible PUA fraud involving inmates at SCI Rockview and other state correctional institutions. The Department of Corrections identified Elise J. Ballard through prison inmate messages as possibly being part of the PUA fraud. The Department of Corrections identified messages between SCI Rockview inmate John Jones and Elise Ballard where 10 inmate names, DOB's, and SSN's were being provided.

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The Department of Corrections identified that Elise Ballard was also connected through prison messages and prison account payments with SCI Huntingdon inmate Robert E. Palmer.

Your affiant was aware of a pattern of recent fraud scheme from previous PUA fraud investigations that inmates were contacting individuals outside of the prison using the State Correctional Institution communication system and providing them with names, DOB's, and SSN's of inmates and having the person on the outside file for PUA. Since the inmates were incarcerated, the person on the outside needed to complete the PUA application and also have an address for the PUA funds to be sent. Affiant also learned from previous investigations involving PUA fraud, that the payments would be sent to the inmate at the address provided on the application in the form of a US Bank Debit card and on some occasion's actual checks from the PA Treasury. Once the PUA funds were received money would be placed on the inmate's prison financial account "JPay" by the person receiving the funds and the person who submitted the application if different from the person who received the funds would receive a payment. JPay is the name of the internal prison money transfer service to deposit money on inmate's commissary or trust account.

On 8/27/20, Affiant traveled to Johnstown, PA and made contact with Elise Ballard at her residence 718 Linden Avenue, Johnstown, PA.

Ballard was home and agreed to talk in her living room. Ballard was advised that she was being contacted regarding inmates obtaining unemployment and asked if she was in possession of any unemployment debit cards. Ballard stated that she did have debit cards and was involved in filing for PUA unemployment for inmates. During this conversation Ballard was sitting at a desk with a functioning desktop computer. Ballard reached into the desk drawer and handed your Affiant a US Bank Debit card in the name of Albert Williams, an inmate at SCI Huntingdon. Ballard stated that she had received approximately five, US Bank Debit cards at her address and used them all and either threw them away or misplaced them. Ballard agreed to go to the Johnstown Police Department to sit down and discuss her role in the PUA unemployment fraud. Ballard drove herself to the Johnstown Police Department to be interviewed.



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Elise Ballard was read her Miranda warnings and agreed to answer questions and make a statement. The interview was also recorded. Ballard stated that she had a boyfriend, two brothers, and several good friends in state correctional facilities. Ballard stated that Robert Palmer is her boyfriend and is in SCI Huntingdon; John Jones is her best friend in SCI Rockview. Ballard stated that she had been asked by Palmer and Jones to file unemployment applications for them. Ballard stated that she understood that filing the applications was not allowed and was fraud. Ballard stated that she thought the pandemic (PUA) money was available to anyone who applied and considered it like stimulus money that everyone could get. Ballard stated that she filled out numerous applications for numerous inmates and could not recall how many applications she completed. Ballard could not recall how much money she received from the debit cards. Ballard stated that she put most of the money on inmate accounts through the prison JPay accounts and sent larger amounts to inmates through MoneyGram. Ballard was shown her communications with inmates and admitted that she had exchanged the messages and information for other inmates during conversations with inmates. Ballard stated that she only had five of the debit cards mailed to her address in inmate names and the rest of the applications she completed were sent to each inmate's residence. Ballard stated that she did not receive any payment from the other inmates for filling out the applications. Ballard was questioned about the other inmate's names and stated several times that she could not recall the numbers and amounts involved with the debit cards. Ballard stated that there were "too many to remember". Ballard reported that she lived alone at the 718 Linden Avenue address. Ballard reported that her home internet was through Atlantic Broadband and that the account was in her name or in Robert Palmer's name.

Your Affiant's reviewed the Department of Corrections inmate financial JPay accounts for inmates John Jones and Robert Palmer. Elise Ballard was listed on the JPay accounts as putting \$3680.00 on John Jones and \$2205.00 on Robert Palmer's inmate accounts in June, July and August of 2020. The deposits into the inmate accounts coincided with the PUA payments placed on the debit cards for those inmates. The JPay system identifies the name and the IP of the person making the deposit and the IP associated with the majority of the deposits made by Elise Ballard came from IP address 138.207.247.124.

Upon reviewing prison messages between Elise Ballard and her boyfriend Robert Palmer, an additional 20 names with DOB and SSN's were found. It was determined that inmate Robert Palmer provided 20 inmate names along

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with DOB's, and SSN's to Elise Ballard through prison messages. The 20 names provided by Palmer to Ballard coincide with completed PUA applications submitted by Ballard.

Your Affiant's requested additional information from the PA Department of Labor and Industry, specific to Elise Ballard. Labor and Industry was able to search for the names of the inmates associated with Ballard, applications completed with similar IP addresses associated with Ballard, and for addresses associated with Ballard. The Department of Labor and Industry found 42 names associated with the search criteria related to Elise Ballard; 31 of the PUA applications were completed using IP address 138.207.247.124. Your Affiant conducted a search and determined that IP address 138.207.247.124 is owned by Atlantic Broadband. A search of Atlantic Broadband records determined that IP address 138.207.247.124 belonged to subscriber Robert Palmer at 718 Linden Avenue, Johnstown, PA.

As a result of the search by the Department of Labor and Industry, the names provided by inmates John Jones and Robert Palmer, were identified as having PUA applications completed. Additional names who had PUA applications completed were found associated with Elise Ballard. The total for all the PUA applications completed by Elise Ballard was 31 applications. Robert Palmer provided 20 of the names and those 20 names totaled \$148,247.00 in PUA funds issued. John Jones provided 10 of the names and those 10 names totaled \$66,915.00 in PUA funds issued. Not all applications that were submitted by Ballard were approved for PUA payments. One name SCI Huntingdon inmate Albert Williams could not be determined how Ballard received it. Albert Williams was the name on the debit card in the possession of Elise Ballard on 8/27/20. Checks with SCI Huntingdon determined that Albert Williams was the cellmate of Robert Palmer at SCI Huntingdon from April of 2020 until September of 2020. Albert Williams received \$10,920.00 in PUA funds. The total for all the PUA funds associated with the 31 PUA applications completed by Ballard was \$226,082.00.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Robert E. Palmer and John R. Jones PUA claims.

The Pennsylvania Department of Labor and Industry records show that Robert Palmer had an application for PUA submitted on June 11, 2020. On the application it was reported that Palmer's last day of employment was



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Defendant Name:	First: ROBERT	Middle:	Last: PALMER	

12/1/2019. Your Affiant notes that Palmer was incarcerated on the date his application was submitted. Additionally, records show that Palmer's application was submitted by an individual using the address 718 Linden Ave, Johnstown, PA. Pennsylvania State Correctional Institution records show that Robert Palmer has been incarcerated in SCI Huntingdon from 11/1/16 thru present.

The Pennsylvania Department of Labor and Industry also provided information regarding PUA payments made to Robert E. Palmer. Records show that Palmer received payments on 6/12/20 (check), 6/17/20 (debit card), 6/20/20 (debit card), 6/23/20 (debit card), 6/29/20 (debit card), 7/9/20 (debit card), and 7/15/20 (debit card). The total for all the payments was \$15,660.00. The payments were from the last day of work listed on Palmer's application to present. These payments directly coincide with the time that Palmer was incarcerated at SCI Huntingdon. The PUA payments were made using check and a US Bank pre-paid debit card with the last four numbers 0310. The Pennsylvania Department of Labor and Industry records show that Palmer's PUA US Bank debit card was mailed to the Linden Ave, Johnstown, PA address.

The SCI Huntingdon inmate money account "JPay" showed that Palmer received money on his account from Elise Ballard on 6/13/20, 6/16/20, 6/19/20, 6/23/20, 6/27/20, 7/21/20, 7/30/20, 8/3/20, and 8/31/20. The total amount deposited, on Robert Palmer's JPay account by Elise Ballard was \$2205.00.

The total amount of PUA funds that were associated with the 20 names Robert Palmer provided Ballard through the State Correctional Institution communication system and the PUA funds he received was \$163,907.00.

The Pennsylvania Department of Labor and Industry records show that John R. Jones had an application for PUA submitted on June 12, 2020. On the application it was reported that Jones last day of employment was 12/29/2019. Your Affiant notes that Jones was incarcerated on the date his application was submitted. Additionally, records show that Jones application was submitted by an individual using the address 718 Linden Ave, Johnstown, PA. Pennsylvania State Correctional Institution records show that John R. Jones has been incarcerated in SCI Rockview from 2/7/17 thru present.



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: ROBERT	Middle:	Last: PALMER	

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Jones. Records show that Jones received payments on 6/13/20 (check), 6/23/20 (debit card), 6/29/20 (debit card), and 7/15/20 (debit card). The total for all the payments was \$21,630.00. The payments were from the last day of work listed on Jones application to present. These payments directly coincide with the time that Jones was incarcerated at SCI Rockview. The PUA payments were made using check and a US Bank pre-paid debit card with the last four numbers 1629. The Pennsylvania Department of Labor and Industry records show that Palmer's PUA US Bank debit card was mailed to the 718 Linden Ave, Johnstown, PA address.

The SCI Rockview inmate money account "JPay" showed that Palmer received money on his account from Elise Ballard on 6/23/20, 6/26/20, 6/27/20, 7/7/20, and 7/25/20. The total amount deposited, on Robert Palmer's JPay account by Elise Ballard was \$3680.00.

The total amount of PUA funds that were associated with the 10 names John Jones provided Ballard through the State Correctional Institution communication system and the PUA funds he received was \$88,545.00.

On 11/17/20, your Affiants traveled to Johnstown, PA and conducted a second interview of Elise Ballard at 718 Linden Ave., Johnstown, PA.

Ballard was read her Miranda warnings and agreed to answer questions and make a statement. The interview was also recorded.

Ballard was questioned about the additional names and applications reported by the Department of Labor and Industry. Ballard admitted to completing all the applications from the list of 31 PUA applications. Ballard stated that she personally received 24 of the PUA US Bank debit cards that were sent to Johnstown addresses. Ballard stated that she used her address and friends addresses in Johnstown to get the debit cards. Ballard stated that the debit cards mailed to other cities were sent to the individual inmate's families and she had no further involvement. Ballard was asked what she did with all the debit cards she received. Ballard stated that once she received a debit card she would withdraw the money and transfer the money to inmate prison accounts. Ballard stated that she disposed of several of the debit cards and some still had balances on the cards. Ballard stated that she knew what



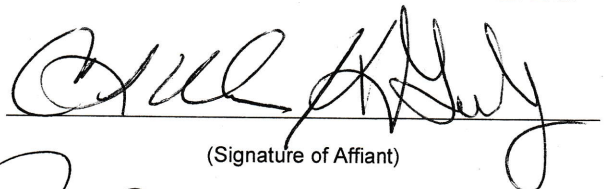
POLICE CRIMINAL COMPLAINT

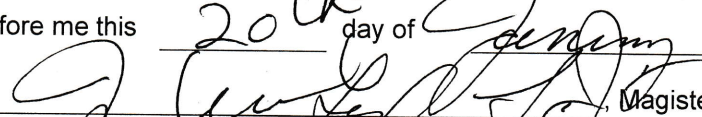
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Defendant Name:	First: ROBERT	Middle:	Last: PALMER	

she was doing was wrong and regretted completing the applications. Ballard stated that she was “just trying to help people out”.

I, SA CHRIS WEAVER/SA KATIE 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.


(Signature of Affiant)

Sworn to me and subscribed before me this 20th day of January, 2021
Date , Magisterial District Judge

My commission expires first Monday of January, 22

