

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: BRADFORD



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 42-3-03
MDJ Name: Hon. TODD CARR
Address: 200 MAIN ST.
TOWANDA, PA 18848
Telephone: 570-268-5057

DEFENDANT: (NAME and ADDRESS):
CHAD MICHAEL SALSMAN
First Name Middle Name Last Name Gen.
1395 GRAND VIEW LN.
WYALUSING, PA 18853

NCIC EXTRADITION CODE TYPE

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-38-21 Date Filed 02/03/21 OTN/LiveScan Number R106970-3 Complaint/Incident Number PA2019-1645949 Request Lab Services? ☒ YES ☐ NO

GENDER ☒ Male ☐ Female DOB AKA First Name: Middle Name: Last Name: Gen. Add'l DOB Co-Defendant(s) ☐

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

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

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

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

DNA ☐ YES ☒ NO DNA Location WEIGHT (lbs.) 180

FBI Number MNU Number FL HEIGHT in. 6 01

Defendant Fingerprinted ☐ YES ☒ NO

Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

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

Office of the Attorney for the Commonwealth ☒ Approved ☐ Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant, affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Chm.P. 607.)

DANIEL J. DYE, ACDAG
(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

2/3/2021
(Date)

I, CPL. BRYAN FEDOR
(Name of Affiant - Please Print or Type)

00618065/10198
(PSP/MPD/PC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop P. Tunkhannock
(Identify Department or Agency Represented and Political Subdivision)

PAPSP8700
(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

with violating the penal laws of the Commonwealth of Pennsylvania at: 412 12 PARK ST. TOWANDA BOROUGH
(Subdivision Code) (Place-Political Subdivision)

in BRADFORD County 08 on or about 09/01/2017-12/23/20 AT VARIOUS TIMES
(County Code) (Offense Date)





POLICE CRIMINAL COMPLAINT

Docket Number: CR3121	Date Filed: 02/03/21	OTN/LiveScan Number	Complaint/Incident Number PA2019-1645949
Defendant Name	First: CHAD	Middle: MICHAEL	Last: SALSMAN

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

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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Lead?	1	3124.1		of the	Title 18, PA Crimes Code	3	F2		
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Sexual Assault

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did engage in sexual intercourse deviate sexual intercourse with a complainant without the complainant's consent. To Wit: the defendant did have sexual intercourse with victims, L.J., A.M., and L.W., without their consent in violation of Section 3124.1 of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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Lead?	2	4952	(a)(1)	of the	Title 18, PA Crimes Code	3	F2		04E/90Z
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Intimidation of Witnesses or Victims

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, with Intent to or with knowledge that his conduct would obstruct, impede, impair, prevent or interfere with the administration of criminal justice, did intimidate or attempt to intimidate any witness or victim, namely, victims L.J., A.M., and L.W., to refrain from informing or reporting to any law enforcement officer, prosecuting official or judge concerning any information, document or thing relating to the commission of a crime, in violation of Section 4952(a)(1) of the PA Crimes Code.

[Handwritten signature]



POLICE CRIMINAL COMPLAINT

Docket Number: CR-38-21	Date Filed: 02/03/21	OTN/LiveScan Number	Complaint/Incident Number PA2019-1645949
Defendant Name	First: CHAD	Middle: MICHAEL	Last: SALSMAN

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

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	3	4952	(a)(3)	of the	Title 18, PA Crimes Code	3	F2		04E/90Z
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):
Intimidation of Witnesses or Victims

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, with intent to or with knowledge that his conduct would obstruct, impede, impair, prevent or interfere with the administration of criminal justice, did intimidate or attempt to intimidate any witness or victim, namely, victims L.J., A.M., and L.W., to withhold any testimony, information, document or thing relating to the commission of a crime from any law enforcement officer, prosecuting official or judge, in violation of Section 4952(a)(3) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	4	5902	(b)(3)	of the	Title 18, PA Crimes Code	1	F3		1
Offense #	Section	Subsection	PA Statute (Title)			Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):
Promoting Prostitution

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, did knowingly promote prostitution of another by encouraging, inducing, or otherwise intentionally causing another to become or remain a prostitute. TO WIT: the defendant did exchange attorney fees for sexual intercourse involving victim, N.A., in violation of Section 5902(b)(3) of the PA Crimes Code.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-38-21	Date Filed: 02/03/21	OTN/LiveScan Number	Complaint/Incident Number PA2019-1645949
Defendant Name	First: CHAD	Middle: MICHAEL	Last: SALSMAN

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.

<input type="checkbox"/> Lead?	5	5902	(b)(8)	of the	Title 18, PA Crimes Code	1	M2		/
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): Promoting Prostitution									
Acts of the accused associated with this Offense: IN THAT, on or about said date, THE DEFENDANT, did knowingly promote prostitution of another by soliciting, receiving, or agreeing to receive any benefit for doing or agreeing to do anything forbidden. TO WIT; the defendant did solicit victim, N.A., to have sexual intercourse with the defendant for exchange of attorney fees, in violation 5902(b)(8) of the PA Crimes Code.									
Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903		Number of Victims Age 60 or Older: 0				

<input type="checkbox"/> Lead?	6	5101		of the	Title 18, PA Crimes Code	2	M2		/
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): Obstructing Administration of Law or other Governmental Function									
Acts of the accused associated with this Offense: IN THAT, on or about said date, THE DEFENDANT, intentionally obstructs, impairs or perverts the administration of law or other governmental function, by force, violence, physical interference or obstacle, breach of official duty, or any other unlawful act. TO WIT, the defendant, did contact victim H.H. asking her involvement in an active criminal investigation that the defendant had knowledge of said investigation, in violation of Section 5101 of the PA Crimes Code.									



POLICE CRIMINAL COMPLAINT

Docket Number: CR-3821	Date Filed: 02/03/21	OTN/LiveScan Number	Complaint/Incident Number PA2019-1645949
Defendant Name	First: CHAD	Middle: MICHAEL	Last: SALSMAN

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

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	7	3126	(a)(1)	of the	Title 18, PA Crimes Code	5	M2		170/11D
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Indecent Assault

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT did have indecent contact with a complainant, namely victims, H.H., A.M., L.J., L.W. and N.A., or did cause the complainant to have indecent contact with the defendant, without the complainant's consent, in violation of Section 3126(a)(1) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	8	4952	(a)(1)	of the	Title 18, PA Crimes Code	2	M2		04E/90Z
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Intimidation of Witnesses or Victims

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, with intent to or with knowledge that his conduct would obstruct, impede, impair, prevent or interfere with the administration of criminal justice, did intimidate or attempt to intimidate any witness or victim, namely victims, N.A. and H.H., to refrain from informing or reporting to any law enforcement officer, prosecuting official or judge concerning any information, document or thing relating to the commission of a crime, in violation of Section 4952(a)(1) of the PA Crimes Code.

POLICE CRIMINAL COMPLAINT

Docket Number: CR-38-21	Date Filed: 02/03/21	OTN/LiveScan Number:	Complaint/Incident Number PA2019-1645949
Defendant Name	First: CHAD	Middle: MICHAEL	Last: SALSMAN

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

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	9	4952	(a)(3)	of the	Title 18, PA Crimes Code	2	M2	04E/90Z
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Intimidation of Witnesses or Victims

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, with intent to or with knowledge that his conduct would obstruct, impede, impair, prevent or interfere with the administration of criminal justice, did intimidate or attempt to intimidate any witness or victim, namely victims, N.A. and H.H., to withhold any testimony, information, document or thing relating to the commission of a crime from any law enforcement officer, prosecuting official or judge, in violation of Section 4952(a)(3) of the PA Crimes Code.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	10	4952	(a)(4)	of the	Title 18, PA Crimes Code	1	M2	04E/90Z
Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of statute or ordinance):

Intimidation of Witnesses or Victims

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, with intent to or with knowledge that his conduct would obstruct, impede, impair, prevent or interfere with the administration of criminal justice, did intimidate or attempt to intimidate any witness or victim, namely, H.H., to give any false or misleading information or testimony or refrain from giving any testimony, information, document or thing, relating to the commission of a crime, to an attorney representing a criminal defendant, in violation of Section 4952(a)(4) of the PA Crimes Code.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-38-21	Date Filed: 02/03/21	OTN/LiveScan Number	Complaint/Incident Number PA2019-1645949
Defendant Name	First: CHAD	Middle: MICHAEL	Last: SALSMAN

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

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older: 0
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<input type="checkbox"/> Lead?	11	4952	(a)(5)	of the	Title 18, PA Crimes Code	1	M2	04E/90Z
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Offense # Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):

Intimidation of Witnesses or Victims

Acts of the accused associated with this Offense:

IN THAT, on or about said date, THE DEFENDANT, with intent to or with knowledge that his conduct would obstruct, impede, impair, prevent or interfere with the administration of criminal justice, did intimidate or attempt to intimidate any witness or victim, namely, H.H., to elude, evade, or ignore any request to appear or legal process summoning him to appear to testify or supply evidence, in violation of Section 4952(a)(5) of the PA Crimes Code.

[Handwritten signature]



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-2021-0001</i>	Date Filed: 02/03/21	OTN/LiveScan Number:	Complain/Incident Number PA2019-1645949
Defendant Name:	First: Chad	Middle: Michael	Last: SALSMAN

AFFIDAVIT of PROBABLE CAUSE

Your Affiant is empowered by law to conduct investigations and make arrests for offenses involving violations of the Crimes Code of Pennsylvania. In the course of his official duties, your Affiant has personally been involved in an investigation into allegations that Chad Salsman committed various sex crimes.

Your Affiant, Cpl. Bryan Fedor, has been a member of the Pennsylvania State Police since May 2005, currently assigned to Troop P Tunkhannock Barracks, Supervisor of the Criminal Investigation Unit. Your affiant has been part of the Troop P Criminal Investigation Unit since 2011 and currently holds the position of Criminal Investigation Unit Supervisor at Troop P Tunkhannock Station since 2018. Cpl. Fedor successfully completed trainings in Interview and Interrogation, Statement Analysis, Crimes Against Children, Certified Class "A" Wiretap, Sex Offender Field Liaison, Advanced Practical Homicide Investigation and Introduction to Forensic Pathology. Your affiant has investigated multiple property crimes, homicides, sexual assaults of both adults and children leading to successful prosecution.

On January 29, 2021, the 45th Statewide Investigating Grand Jury issued Presentment No. 14 resulting from Notice of Investigation 44, recommending that criminal charges be filed against Chad Salsman for violations of the Crimes Code of Pennsylvania. The aforementioned Presentment was accepted by the Honorable Richard A. Lewis, Supervising Judge of the 45th Statewide Investigating Grand Jury. Having read and reviewed the Presentment, and after having participated in this investigation and considering all the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause (A copy of the Presentment is attached hereto). Based upon our review of the testimony given before the Grand Jury and the documents produced for the Grand Jury, we believe that the testimony of the various witnesses is accurately summarized in the Presentment and that the records referred to in the Presentment are stated accurately.

(CONTINUED)

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

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

CPL. B. Fedor
(Signature of Affiant)

Sworn to me and subscribed before me this 3rd day of FEBRUARY 2021

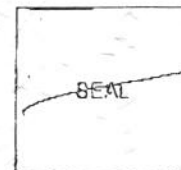
Date

James L. Carlson

, Magisterial District Judge

My commission expires first Monday of January, Sn. Magisterial District Judge

Specially Assigned





**POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE**

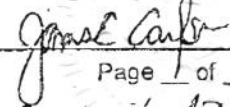
Docket Number: CR-38-21	Date Filed: 02/03/21	OTN/LiveScan Number:	Complaint/Incident Number PA2019-1645949
Defendant Name:	First: Chad	Middle: Michael	Last: SALSMAN

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Based upon our review of the evidence, we have concluded that there is probable cause to believe that Chad Salsman engaged in illegal activities which are accurately summarized in the attached Presentment. We have determined that there is probable cause to conclude that Chad Salsman violated the following laws of the Commonwealth of Pennsylvania: Sexual Assault, Involuntary Deviate Sexual Assault, Indecent Assault, Promoting Prostitution, Intimidation of a Witness or Victim, and Obstruction of Justice related to five (5) female adult victims identified by initials within the presentment.


(Signature of Affiant)

2/3/21


Page 1 of 1
Magistrate District Judge
Specially Assigned

POLICE CRIMINAL COMPLAINT

Docket Number: <u>CR-38-21</u>	Date Filed: <u>02/03/21</u>	OTN/LiveScan Number: <u>1100021</u>	Complaint/Incident Number: <u>PA2019-1645949</u>
Defendant Name:	First: <u>CHAD</u>	Middle: <u>MICHAEL</u>	Last: <u>SALSMAN</u>

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

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

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

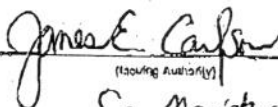
FEBRUARY 03, 2021

(Date)


(Signature of Plaintiff) 10/58

AND NOW, on this date, FEBRUARY 3, 2021 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)

SR. Magisterial District Judge
Specially Assigned

SEAL

INTRODUCTION

We, the members of the Forty-Fifth Statewide Investigating Grand Jury, having received and reviewed evidence regarding violations of the Pennsylvania Crimes Code occurring in Bradford County, Pennsylvania pursuant to Notice of Submission of Investigation No. 44, do hereby make the following findings of fact and recommendation of charges.

OVERVIEW

The Grand Jury conducted an investigation into sexual assaults committed by Chad Salsman ("Salsman") who was sworn in as the District Attorney of Bradford County in January 2020. The matter was submitted to the Grand Jury following a referral to the Pennsylvania Office of Attorney General in late 2019 by then-District Attorney Daniel Barrett, who cited a conflict of interest. It was determined that while he was engaged in private practice, Salsman repeatedly used his position to pressure vulnerable female clients into sexual contact at his law office located at 12 Park Street in Towanda. The Grand Jury recommends that Salsman be charged with sexual and other offenses involving five different women. While evidence before the Grand Jury indicated that many other women were placed in the same position, those events occurred outside the statute of limitations and therefore cannot serve as the basis of criminal charges. As detailed below, the Grand Jury finds that Salsman abused the power and the authority of his position as an attorney.

FINDINGS OF FACT

Following his graduation from the Widener University School of Law, Salsman began practicing law in 2001. During his years of private practice, he represented numerous women in connection with criminal cases or in child custody matters. Many of Salsman's clients struggled with addictions, had a history of being sexually abused, or suffered from other vulnerabilities which Salsman exploited. He used his knowledge of their vulnerabilities to overcome their lack

of consent and sexually assault them. In one case, Salsman assaulted a woman whom he knew had been the victim of a prior violent rape. In another case, Salsman assaulted a woman who faced incarceration if Salsman did not help her.

In most cases, Salsman had sex with the women on his office desk and then directed them to his private bathroom to "clean up" using paper towels or cleaning wipes. He directed them not to tell anyone about the assaults and, in one case, even suggested to a woman that she should not cooperate with this investigation. The details of the assaults, threats and intimidation are set forth below.

- **L.J.**

L.J. retained Salsman to represent her in 2017 on charges of harassment and possession of drug paraphernalia. He did not bill L.J. for the total services rendered, however. Instead, Salsman requested that she provide nude photographs or videos depicting sexual acts between L.J. and her girlfriend. L.J. complied.

On numerous occasions, Salsman grabbed the breasts or buttocks of L.J. without her consent while she was present in his law office. On one occasion, he led her to his desk and directed her to disrobe. Salsman then inserted his penis into L.J.'s vagina and licked her vagina without her consent. In an attempt to explain that she did not want to have sex with Salsman, L.J. told him that she was gay. This did not stop Salsman from proceeding.

As Salsman continued to penetrate her - - while chastising her for not displaying pleasure - - L.J. received a text message from her girlfriend inquiring "what was taking so long" at Salsman's office. L.J. texted back, but did not tell her girlfriend what was occurring. "I was too ashamed." Salsman, seemingly undisturbed by the texting, continued to copulate. Afterwards, he

instructed L.J. to tell no one. She had to rub off his ejaculate with cleaning wipes in his private office bathroom.

L.J. testified that she went home in tears and immediately showered. L.J. stated, "My girlfriend kept asking me what was so wrong and why I was quiet. I told her nothing, I was fine. I wouldn't tell her. She knew something wasn't right."

L.J.'s girlfriend also testified before the Grand Jury. She recalled the incident and stated that while she did not know what had occurred, she recalled L.J. entering their home in distress and then immediately showering. She was aware that L.J. had been meeting with Salsman and suspected something had happened during that time. She stated that L.J. has never told her the details as to what occurred.

- **H.H.**

In December 2017, Salsman was court-appointed to represent H.H. in a child custody matter. In the course of representing H.H., Salsman made suggestive comments and would touch her under the table during court proceedings. Salsman asked H.H. to have sex with him but she refused. He told her to send videos of her having sex with someone since she refused to have sex with him. When H.H. again refused, Salsman told her that he needed naked pictures because he was not being adequately compensated for his representation. At that point H.H. felt she had no choice and sent nude pictures to Salsman.

On another occasion, Salsman provided H.H. with a video of a nude woman in a bathtub. The Grand Jury identified that woman and obtained her testimony. She explained the circumstances surrounding the creation of the video. She stated that she was suffering from a death in her family and that Salsman had reached out to comfort her. He then began asking for naked pictures and videos of her. She provided Salsman with the video of her nude in the bathtub

at his request. Salsman then forwarded the video to H.H. without the consent of the woman in the video.

H.H. testified that Salsman revealed a steady stream of confidential or private information, on matters "including his cases, his legal cases on other people, pictures of other people, pictures – naked pictures of other clients, of people. I don't know if they were clients or not, his wife, pictures of his kids." Salsman justified his demands for H.H.'s time, as well as his sexual demands, by complaining about his court appointment to her case. Salsman told her "I don't get paid for this. I do everything for free." In reality this assertion, intended to pressure his client into sex, was a lie. Salsman actually was paid for his court-appointed representation with taxpayer's funds in the amount of \$2,115.00.

H.H. testified that Salsman told her that he masturbated dozens of times a day. She knew he had "an issue" and she was concerned about his failure to effectively represent her. He sent her pictures of her own residence that he had taken from outside her home and without her knowledge.

In April 2019, H.H. sought new legal counsel and went to Salsman's office to obtain her file. At that time Salsman forcibly grabbed her breasts while in his private office. H.H. stated that his hands were "around me, onto my breasts, onto my shoulders." H.H. was able to kick Salsman and leave with her file.

During this investigation, the Grand Jury reviewed evidence that H.H. met with Salsman, after he became the District Attorney of Bradford County, while she was wearing a recording device monitored by the Pennsylvania State Police. Between January and March 2020, Salsman provided H.H. with legal advice regarding her participation in this investigation, advising her as though he represented her, even though she already had a lawyer, and even though he himself was the target of the investigation. That advice suggested that H.H. should not cooperate with

authorities. Salsman also told H.H. that the investigation must be about him having sex with his clients, but he claimed – despite his unsuccessful assault on H.H. herself – that the sex was all entirely consensual, and the investigation was therefore, in his word, a “witchhunt.”

On December 22, 2020, a search warrant was executed at Salsman’s private law office. Salsman contacted H.H., despite the fact that by this point he knew he was under grand jury investigation, and despite the fact that he was now the District Attorney and therefore himself a law enforcement official. He told her he suspected that the warrant related to her, asked her why the warrant had been issued, and pressed her for any information she had disclosed.

- **A.M.**

Salsman began representing A.M. on various legal matters when she was 19 years old. He represented her in connection with a child custody matter and, on another occasion, he represented her boyfriend with respect to a child custody matter. In both instances, A.M. and/or her boyfriend paid for the legal services provided. In May 2018, A.M. contacted Salsman regarding her arrest for driving under the influence. Salsman told her that she faced jail time for the offense. A.M. advised that she did not have the money to hire Salsman because she had been out of work for six months.

A.M. testified that once Salsman learned she was having financial difficulties, he began “coming onto” her. She stated that she felt as though she had no choice in the face of being sent to jail. Salsman told A.M. that “his wife wasn’t giving him what he needed at home.”

Salsman had sex with A.M. without her consent on his desk in his private law office. Afterwards, he directed her to clean up in his private bathroom using paper towels. In her own words, A.M. testified that, “he would always remove the stuff on his desk, and he would have sex with me there. And then I would have to go into the bathroom and clean before I left.” During

legal meetings, Salsman also touched A.M.'s breasts and buttocks without her consent. Salsman made her perform oral sex on him and engaged in vaginal sex with her on numerous occasions. She paid almost nothing for legal services. A.M. testified that Salsman "would tell me I would be okay when it came to my DUI, and that I could take my time and make just random payments here and there so (REDACTED) his secretary would not think nothing." After state police contacted her about this investigation, Salsman repeatedly pushed her to get information from other women about anything they may have revealed to authorities. He told her never to disclose what had occurred and indicated that he could help her if he became the District Attorney.

A.M. testified, "He told me once he got into the D.A.'s position that everything I owed him was no longer an issue and it would be harder for him to have me come see him with him being D.A." Salsman had sex with A.M. one final time after he was elected district attorney in November 2019.

- L.W.

In her appearance before the Grand Jury, L.W. explained that Salsman represented her boyfriend. Salsman had also represented another man, who had previously sexually assaulted L.W. L.W. informed Salsman that his former client had raped her. According to L.W., Salsman had no visible reaction. In the course of his representation of her boyfriend, L.W. was in Salsman's presence on several occasions while attending legal meetings. Salsman also hired L.W. and her boyfriend to do repair or remodeling work at his private law office, and loaned her money.

In October 2018, L.W. stopped by Salsman's law office to drop off her last repayment of the loan. Salsman instructed her to come in through the back door which led directly into his private office. Upon entering, Salsman took the money and directed L.W. to undress. L.W. testified that Salsman "told me he wanted to see what they (her breasts) looked like because he

said that they were big through my shirt.” Her prior rape had been violent and Salsman knew about it. She testified that she was too afraid to resist again. So she complied with his demand. She testified, “He started licking my vagina... and then pulled me down closer to the edge (of the desk) when he was done and had sex with me.” After the assault, Salsman directed her to his private bathroom to clean up using paper towels. Later, he contacted her and told her not to breathe a word to anyone, or he would ruin her life.

- N.A.

N.A. appeared before the Grand Jury and testified that she retained Salsman to represent her in connection with a child custody matter. She testified that nothing mattered to her more than securing the custody of her children: “Just my kids.” But Salsman, representing her in the most important matter in her life, required little in the way of fees.

Instead, in December 2018, Salsman began touching N.A.’s breasts in his office and touching her inappropriately during court proceedings. He then began asking for nude photos of her. She testified, “I was getting up to leave and he touched my breast. I backed up and just kind of – I was taken – I didn’t know how to respond to that.” These instances of contact were without her consent.

Salsman informed N.A. that she could compensate him for his legal work by having sex with him. As he put it, “I could slam your pussy and you wouldn’t have to pay.”

N.A. began a consensual sex-for-services relationship with Salsman. When the relationship soured, however, Salsman became more aggressive and threatening. He told her that as her attorney he could not be in a relationship with her - - making reference to a law book in his office - - and told her to tell no one about what had occurred.

- **Staff**

Members of Salsman's staff also appeared before the Grand Jury. These individuals confirmed that Salsman would often meet with female clients in his office one-on-one. Testimony demonstrated that even though Salsman's legal secretaries had access to all client information, and were covered by the attorney-client privilege, Salsman went to great lengths to keep his interactions with his clients a secret from the staff. Salsman even went so far as to ask secretaries to play music to drown out anything that could be happening in his office and used an air conditioner unit or noise machine to mask any sounds or noise occurring in his office. Female clients were seen leaving Salsman's office in tears or in distress.

Members of Salsman's staff, like his clients, were placed in compromised positions by him. One former staffer admitted that she herself had a consensual ongoing sexual relationship with Salsman. Another stated that prior to her testimony, Salsman met with her in his office, and, in his capacity as the District Attorney of Bradford County, directed her to report back to him anything that occurred within the Grand Jury. That witness had been ordered by the Supervising Judge not to disclose her testimony to anyone, however. Salsman later complained about the order of non-disclosure in text messages obtained by the Pennsylvania State Police.