

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: ALLEGHENY



**POLICE CRIMINAL COMPLAINT**  
**COMMONWEALTH OF PENNSYLVANIA**

**VS.**

MDJ: PITTSBURGH MUNICIPAL COURT  
Magisterial District Number: 05-0-03  
Address: 660 FIRST AVENUE  
PITTSBURGH, PA 15219  
Phone: 412.350.6715

DEFENDANT: (NAME and ADDRESS):  
KEITH RAYMOND BROWN  
*First Name Middle Name Last Name Gen.*  
LKA 3592 BRIGHTON RD, APT 7 PITTSBURGH, PA 15212

**NCIC Extradition Code Type**

Felony - Full Extradition  
Distance: \_\_\_\_\_

**DEFENDANT IDENTIFICATION INFORMATION**

<b>Docket Number</b>	<b>Date Filed</b>	<b>OTN/LiveScan Number</b> G 885187-2	<b>Complaint/Incident Number</b> OCW-20-0012	<b>Request Lab Services?</b> <input type="checkbox"/> Yes
<b>GENDER MALE</b>	<b>DOB</b> 11/23/1967	<b>POB</b>	<b>Add'l DOB</b>	<b>Co-Defendant(s)</b> <input type="checkbox"/>
<b>RACE BLACK</b>	First Name		Middle Name	Last Name Gen.
<b>ETHNICITY</b>	AKA			
<b>HAIR COLOR XXX (UNK./BALD)</b>		<b>EYE COLOR BRO (BROWN)</b>		
				<b>WEIGHT (lbs.)</b>
<b>DNA</b>	<b>DNA Location</b>			
<b>FBI Number</b>	<b>MNU Number</b>		<b>Ft. HEIGHT In.</b>	
<b>Defendant Fingerprinted</b>				6 03
<b>Fingerprint Classification</b>				

**DEFENDANT VEHICLE INFORMATION**

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

Office of the attorney for the Commonwealth  Approved  Disapproved because: \_\_\_\_\_

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

\_\_\_\_\_  
name of the attorney for the Commonwealth (Signature of the attorney for the Commonwealth) (Date)

I, JOHN DILUCENTE PAAG563  
(Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

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 PITTSBURGH CITY  
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County 02 on or about 06/03/2020 12:00  
(County Code)



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<b>Defendant Name</b>	First: KEITH	Middle: RAYMOND	Last: BROWN

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. 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.)

<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 18 903						
<b>X</b>	1	911	B3	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 911B3 CORRUPT ORGANIZATION F1 1 COUNT									
The actor, employed by or associated with an enterprise, conducted or participated, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity, namely, Linda Slade, Rochelle Oaks, Stacy Robinson, Keith Brown and others known and unknown operated a scheme to defraud the Pennsylvania Department of Labor of Pandemic Unemployment Assistance Funds in violation of 18 Pa. C.S. §911(b)(3).									

<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 18 903						
	2	911	B4	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 911B4 CORRUPT ORGANIZATION F1 1 COUNT									
The actor conspired with Stacy Robinson, Rochelle Oaks, Linda Slade and others known and unknown to defraud the Pennsylvania Department of Labor of Pandemic Unemployment Assistance Funds to violate any of the provisions of subsections (1),(2) or (3) of Section 911(b) of the Pennsylvania Crimes Code, in violation of 18 Pa. C.S. §911(b)(4).									



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<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 18 903						
Lead?	3	3921	A	of the	18	1	F2	<b>NCIC Offense Code</b>	<b>UCR/NIBRS Code</b>
<b>PennDOT Data (if applicable)</b>		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3921A THEFT BY UNLAWFUL TAKING F2 1 COUNT The actor unlawfully took, or exercised unlawful control over movable property, namely Pandemic Unemployment Assistance Funds from Pennsylvania Department of Labor with the intent to deprive the owner thereof and the offense was committed during a manmade disaster, a natural disaster or a war-caused disaster, in violation of 18 Pa. C.S. §3921(a).									

<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input checked="" type="checkbox"/> <b>Conspiracy</b> 18 903						
Lead?	4	903		of the	18	1	F2	<b>NCIC Offense Code</b>	<b>UCR/NIBRS Code</b>
<b>PennDOT Data (if applicable)</b>		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY F2 1 COUNT The actor, with the intent of promoting or facilitating the crime of 18:903: conspired and agreed with Stacy Robinson, Rochelle Oaks, Linda Sladeand others known and unknown that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									

<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 18 903						
Lead?	5	3922	A1	of the	18	1	F3	<b>NCIC Offense Code</b>	<b>UCR/NIBRS Code</b>
<b>PennDOT Data (if applicable)</b>		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3922A1 THEFT BY DECEPTION F3 1 COUNT The actor intentionally obtained or withheld property, namely, Pandemic Unemployment Assistance Funds with a total value greater than \$2,000 belonging to Pennsylvania Department of Labor by deception, in violation of, 18 Pa. C.S. §3922.									



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<b>Inchoate Offense</b>	<input type="checkbox"/> <b>Attempt</b> 18 901 A	<input type="checkbox"/> <b>Solicitation</b> 18 902 A	<input type="checkbox"/> <b>Conspiracy</b> 18 903						
	6	4911	A2	of the	18	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
<b>PennDOT Data (if applicable)</b>	Accident Number					<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description/Acts of the accused associated with this Offense:

18 4911A2 TAMPERING WITH PUBLIC RECORDS OR INFORMATION F3 1 COUNT

The actor made, presented or used a record, document or thing knowing it to be false, and with intent that it be taken as a genuine part of any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government, namely Pandemic Unemployment Assistance Application, with the intent to defraud or injure another, in violation of 18 Pa. C.S. §4911(a)(2) and (b).



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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 is comprised of the preceding page(s) numbered \_\_\_\_\_ through \_\_\_\_\_
5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

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

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

\_\_\_\_\_, 03/29/2021 /JOHN DILUCENTE/  
 (Date) (Signature of Affiant)

AND NOW, on this date \_\_\_\_\_ 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)







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## AFFIDAVIT of PROBABLE CAUSE

**1. WHEN:**

- a) Date when Affiant received information:
  
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

**2. HOW:**

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
  
- b) How the source of information knows this particular person committed the crime:
  
- c) How both Affiant and/or source of information knows that a particular crime has been committed:

**3. WHAT CRIMES:**

18 911 B4 CORRUPT ORGANIZATION  
 18 4911 A2 TAMPERING WITH PUBLIC RECORDS OR INFORMATION  
 18 911 B3 CORRUPT ORGANIZATION  
 18 3921 A THEFT BY UNLAWFUL TAKING  
 18 3922 A1 THEFT BY DECEPTION  
 18 903 A1 CRIMINAL CONSPIRACY

**4. WHERE CRIME(S) COMMITTED:**

PA DEPARTMENT OF LABOR & INDUSTRY 301 5TH AVENUE SUITE 330 PITTSBURGH, PA 15222

**5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:**

Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.  
 Source has given information in the past which has led to arrest and/or conviction  
 Defendant's reputation for criminal activity  
 This source made declaration against his/her penal interest to the above offense  
 Affiant and/or other Police Officers corroborated details of the information



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## AFFIDAVIT OF PROBABLE CAUSE

Your Affiants, Special Agents John DiLucente and Greg Matthews of the Pennsylvania Office of Attorney General (OAG), being duly sworn to law, depose and say:

### I. AFFIANTS' BACKGROUND

#### Pedigrees

Your Affiant, Agent John DiLucente, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation assigned to the Financial Crimes Section, and is empowered by law to conduct investigations and make arrests relating to public corruption, white-collar crimes, theft, fraud, election code violations and other violations of Pennsylvania Law. Your Affiant has conducted numerous investigations involving financial crimes. Your Affiant has been so employed since by the Internal Revenue Service Criminal Investigation Division for 27 years, prior to that position worked in the civil division of the IRS for 4 years and is currently assigned to the Financial Crime Section in Pittsburgh, Pennsylvania.

Your Affiant, Supervisory Special Agent Gregory Matthews, is a Supervisory Special Agent with the Pennsylvania Office of Attorney General, currently assigned to the Bureau of Criminal Investigations (BCI), Western Region Office. Your Affiant has been a Special Agent with the Attorney General's Office since 2015 and a Supervisory Special Agent since 2018. Prior to being assigned to BCI your Affiant was assigned to the Medicaid Fraud Unit. Prior to 2015 your Affiant was a member of the Allegheny County Bureau of Police for approximately twenty-eight (28) years, the majority of that time assigned to the Detective Division. Your Affiant's law enforcement duties and responsibilities, in part, arise from the governing provisions of the Commonwealth Attorney's Act in regard to criminal investigation referrals from Commonwealth agencies, to include any such referral(s) from any/all District Attorneys within the Commonwealth. The information contained in this affidavit was learned directly by your Affiant, or relayed by other law enforcement officers and/or other individuals who are known to your Affiant and will be available to testify at any necessary court proceeding.

Based upon your Affiants' law enforcement experience and training, your Affiants are 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 Affiants have special expertise regarding the practices of, and techniques used by, these offenders.

During the course of this investigation, witnesses have provided information that will be contained in this affidavit. Your Affiants has specifically ascertained these witnesses' identities. Your Affiants has verified the witness identities through positive proof of identification. These witnesses have indicated below that they have personal knowledge regarding the criminal incident that transpired or information that they have relayed and provided to Agents and your Affiants as more fully detailed below. Because of the concerns for the witnesses' personal safety, their identities are being withheld for the purpose of this affidavit to preserve the integrity of the investigation. The witnesses will be referred to as Witness followed by a numerical indicator corresponding with that particular witness. These witnesses will be available for any further court proceedings.

All of the information contained in this affidavit was learned directly by your affiants or related to your affiants by other agents, police officers or investigators involved in this investigation.

### 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 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





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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 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.

III. Fraudulent Claim  
ANONYMOUS E-MAIL

On July 14, 2020 an anonymous email was sent to the Office of Attorney General providing information about people assisting others with the filing of Pandemic Unemployment Assistance (PUA). In the email the author advises that a female named Slade (later identified as Linda Slade) has bragged about making no less than \$50,000 of untaxed cash payments as a result of helping people file their claims and then withholding login credentials. After she files the claim she refuses to relinquish the username and password until you pay her \$1,000 cash payment. The emailer identified her vehicle as a small car with a License plate # JLV9540. This license plate is registered to Slade Janeen Slade at 1337 Preston St, Pittsburgh, PA 15205.

The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry to request the application and payment information regarding Slade. Pennsylvania Department of Labor and Industry records show that Slates’ application for PUA was submitted on June 3, 2020 at 11:12:14 P.M. PA Dept. of Labor also provided (30) additional PUA claims using the same IP address. Twenty nine (29) of these PUA claims were filed between June 3rd and June 5th 2020. An investigative search revealed that the IP Address came back to the Double Tree Hotel in Coraopolis, PA. Supervisory Special Agents John DiLucente and Greg Matthews subsequently attempted to interview individuals whose PUA claim was filed using the IP address from the Double Tree hotel.

On September 9, 2020, agents interviewed Oaks at her residence located at 2540 Irwin Ave, Pittsburgh, PA 15214. During the interview Oaks stated that she did file her unemployment compensation for herself and her husband Benjamin Oaks. Oaks was asked where she physically filed the claims and she said right here at home on her personal laptop computer. Oaks was asked if she filed any additional applications for anyone else and she said yes, she filed for Slade, her friend, as well. She said she filed in the first week of June 2020. We advised Oaks that we had information that her claim was filed someplace in the Coraopolis area and she replied, no I filed them all here at my house. Oaks was asked again if she may have filed for up to thirty individuals and she paused and said thirty is a big number, maybe in the twenties. Oaks was asked to name the individuals she filed claims for and she said she could not remember. SA DiLucente asked if she filed a claim for Ivy Wofford and Oaks said yes she was just here a few weeks ago. Oaks added that everyone she filed a claim for came to her house so she could ask questions for the application process. Oaks said she never charges a fee for filing these applications. SA DiLucente then asked Oaks if she filed claims for Angelic Lewis, Rosalyn Burton, or Charles Hunter at which point she said no. She could not recall any other names. OAKS was re-interviewed on September 28, 2020 in the presence of counsel. During the interview Oaks stated she had five (5) different college degrees and her prior employment included working for the Pittsburgh public school district as a teacher. She also worked for the Penn Hills school district. In the beginning of 2020, Oaks was working for Kelly Services fulltime when she became sick in February 2020 related to her diverticulitis condition. Oaks heard through a friend that she may be eligible for the PUA money. She was told Stacy Robinson is a person that can help determine if you’re eligible for PUA money and could assist with the application process. Oaks obtained Robinson’s cell phone number, called her and left a message (Oaks provided Robinson’s cell phone number as 412-606-7558). During this same time frame (early June 2020), Oaks said that there was a mouse in her house and she decided to move to a hotel until her husband killed the mouse. Oaks checked into the Double Tree hotel in Coraopolis, PA on June 2, 2020 at 7:48 pm. And her room was on either the second or third floor. She provided the hotel receipt to investigators. Oaks said she chose this hotel because she had Hilton Hotel points and the rate was only \$57 per night.



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Oaks said that she decided to go to the hotel because she needed to study for the Notary test and was freaked out about the mouse at her house. The next day, June 3rd, Oaks met a few friends in Green Tree for lunch. This is when Robinson returned Oaks call. Oaks proceeded to return to the hotel and called Robinson back to discuss the PUA money. Robinson informed Oaks that she did qualify for the PUA money and proposed that she would walk her through the application process if she would do some additional applications for other people on behalf of Robinson. Robinson told Oaks that she would pay her for doing the applications and that it was legal to prepare other people's applications for money. Oaks agreed and Robinson then gave her the names and phone numbers of several individuals that needed their unemployment applications completed. Within ten minutes of hanging up with Robinson, Oaks began to receive text messages from an unknown person related to the applications. Oaks immediately called Robinson who said that was her boyfriend Keith Brown texting her and that he works with her (Robinson). After speaking with Stacy Robinson (on June 3rd), she decided to call her friend Linda Slade and tell her that she might qualify for the unemployment money. Slade has a business where she cleans house for a living. Slade immediately drove to the hotel to meet with Oaks where Oaks talked Slade through the unemployment application process. Slade and Oaks both had their personal computers while in Oaks hotel room. After Oaks and Slade completed Slade's application, Slade returned home and Oaks began to call people on her list provided by Stacy. When Oaks called the individuals, she explained that she received their phone number from Stacy Robinson and that she was able to prepare there unemployment applications. Oaks said she would ask each person questions from the application such as; what is your address, DOB, zip code, SSN, where did you work, when was the last day you worked, etc. Oaks stayed at the Double Tree hotel from June 2nd through June 5th. The next day (June 4th), Slade returned to the hotel with her laptop where she and Oaks worked on unemployment applications. Slade was working on her own list while Oaks was working off the list provided by Robinson. Oaks said she did not think Slade was charging her family members for doing their applications but was not sure if she charged non-family members. Slade does not know Stacy Robinson or Keith Brown. Oaks said that she and Slade worked on applications throughout the day and Slade eventually returned home. Oaks spent the night at the hotel and checked out the next day (June 5, 2020). Oaks said she eventually began to meet with Brown who she described as 5'10" or 5'11" tall, medium build and his nickname was "killer". His cell phone number is 412-759-4296. Oaks said she used to meet him in the Manchester section of Pittsburgh and she recalled he may have been driving a car with New York plates. She described the car as grey and not a newer car. He normally parked his car near the new houses located close to the post office just off of California Avenue. Oaks would meet with Brown to pick up the money owed to her by Robinson for doing unemployment applications. Oaks said that she estimates meeting with Brown approximately twelve (12) times. At each meeting Brown would hand Oaks cash, sometimes the cash was inside an envelope. Oaks explained that the cash she received depended upon the amount Robinson charged each individual for their unemployment application prepared by Oaks. If Robinson charged a person \$1,000 for the preparation of their unemployment application, Oaks would receive \$600 and she understood Brown would get \$400. If Robinson charged \$700, Oaks received \$400 and Brown would get \$300. If Robinson charged \$500, Oaks received \$300 and Brown received \$200. Oaks described Stacy Robinson as a black female, 5'9", in her 40's, single (Brown is her boyfriend). She lives at 1502 Arch St, the corner of Arch and Jacksonia.

Oaks said that believes she prepared approximately fifty (50) unemployment applications during the time period of June 3rd through July 25th. She believes that she prepared about twenty (20) applications while staying at the hotel and the other thirty (30) were completed at her residence. Oaks does not know her IP address at her residence. Agent DiLucente showed Oaks a spreadsheet containing names of individuals that applied for unemployment money using the IP address of the Double Tree hotel during the time frame Oaks was a guest at the Double Tree. Oaks wrote a check mark next to the names that she remembered preparing their unemployment application. The names Oaks checked were: Matthew Burton, Rosalyn Burton, Jerome Davis (cousin), Nashead Goodwine (former student), Charles Hunter, Stephanie Johnson, Tameron Jones (former student), Angelic Lewis, Tyrone Maddox-Washington, Julius Marbury, James McArthur (Oaks knows from South park), Frederick Mossette, Benjamin Oaks (Oak's husband), Terrell Page, Jennifer Simmons (Oaks has known forever), Melvin Walker, Sandra Washington, Tyrone Washington, Vanessa Washington, Duvon Wiley (Oaks is friends with his mother), Ivy Wofford (Jerome Davis' girlfriend). It was pointed out to Oaks that a few of the names on the list; Melaiya Jones and Julius Marbury, had their applications prepared using the Double Tree IP address on dates well after June 5th when Oaks checked out of the hotel. The exact dates were June 25th and July 13th for Melaiya Jones and July 12th for Julius Marbury. Oaks was at a loss of why that would be; she was



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adamant that she was only at the Double Tree hotel from June 2nd thru June 5th. She insisted that she did not return to the hotel in order to prepare anymore unemployment applications.

Oaks was asked specifically about her dealings with Nasheed Goodwine relative to the preparation of his unemployment application. Although Oaks remembers Nasheed as a former student from about five years ago she got Nasheed's name from Robinson relative to him wanting his unemployment application prepared. Oaks said that Nasheed never paid her, he may have paid Stacy but she's not sure. Oaks said that she got Angelic Lewis' name from Robinson as well. Oaks said that she and Slade talk every day. During the time they were preparing unemployment applications (June and July 2020) they discussed various items on the applications they were preparing. Oaks said that Kim Powe was bringing names of people to her that wanted unemployment applications prepared. Oaks has known Powe over the years.

Oaks said that when she received money for preparing unemployment applications it was either from Keith or directly from the individual person. It was not until an individual received their benefits money that they would either pay Keith or Oaks directly. Once a person paid for the application service provided by Oaks she would give them their user name so that they could re-up their weekly applications on their own. At that point Oaks was out of the loop.

TEXT MESSAGES - During the meeting Oaks provided investigators with photocopies (12 pages) of text messages between her and Keith Brown (aka "Killer"). Contained within the text messages between Oaks and Brown are discussing numerous things such as: individuals, the individuals' phone numbers, whether someone or another "Qualified", their application is complete, they received their money, Ms. Rosalyn needs a ride to the bank, discussing if Robinson completed some of the applications, Leona got hers she is giving Slade the \$\$\$ tomorrow, here is a list of those that should pay today Phillip Davis, Dennis Burton, Andrew Boyd, Brian Jones, Sam Tuck, Elizabeth Reid, Stephanie Johnson, Phillip Burton, Cheryl Thompson, you gave me \$2000 who was that for? Phillip, Dennis or his mother in law?

Keith Brown (aka "Killer") – Agents DiLucente, Terry Sweeney and Matthews attempted several times to contact Brown at his last known address of 3592 Brighton Rd, Apt #7, Pittsburgh, PA with no success. On March 15, 2021 agent DiLucente called Brown's cell phone provided by Oaks (412-759-4296). Brown said he never filed any PUA or unemployment applications, he said Stacy Robinson filed them. Brown said "Stacy is deceased" and was his girlfriend. Brown was asked if he knew Oaks and he said "yes, she also filed PUA applications". Brown was asked what his role was in the PUA application business between Robinson and Oaks. Brown said that he was basically "watching Oak's back". He said he met Oaks near California Ave three or four times. He said he would jump in the car and ride around town with her while she collected money from people for whom she filed PUA claims. Brown admitted that he was paid at least \$1,000 in cash for watching over Oaks.

Stacy Robinson – Agents DiLucente and Matthews attempted on numerous occasions throughout September and October 2020 to interview Robinson at her address of 1502 Arch St, Pittsburgh, PA. After several attempts, agent DiLucente left his business card in the door with a message for Robinson to call. A few days later, a female stating she was Stacy's sister called agent DiLucente's cell phone and said "Stacy had recently died". Documents provided by the Dept. of Labor show that Robinson prepared eighty-one (81) PUA claims from the IP Address of 73.40.212.145. Agents have not yet received all of the documentation from the PA Dept. of Labor, therefore the total amount of the (81) PUA claims is unknown at this time.

Linda Slade was interviewed on January 8, 2020. Slade said that in early June 2020 she met her friend Rochelle Oaks at a park in Green Tree. While at the park Oaks received a telephone call from "Baldie" Goodwine and abruptly left. Later that evening Oaks called Slade and told her about the PUA claims and that she may be eligible to file and get money. Oaks asked Slade to bring her laptop and meet her at a hotel near Robert Morris (which is where the Double Tree hotel is located). When Slade arrived at Oaks' hotel room, she explained to Slade that a woman she recently met, Stacy Robinson, can help you get money through the unemployment compensation. Oaks explained to Slade how to fill out the application and what answers to submit. Oaks also told Slade that Robinson is looking for more names of people interested in filing for Pandemic Unemployment Assistance (PUA). Slade said she stayed at the hotel with Oaks for a few hours that night, prepared a handful of applications and then went home. The following Sunday evening, Oaks called for Slade and several others to meet at her house. This is when Oaks told Slade that Robinson knows someone in the unemployment office that showed her how to beat the system. Slade said that she knows Gerry Davis (Oaks' cousin) was sending people's names to Oaks. Oaks explained to Slade that she needed to get her own names to file these PUA claims. Slade said they (her and Oaks) were charging individuals between \$500 (for friends) and \$1,000



# POLICE CRIMINAL COMPLAINT

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<b>Defendant Name</b>	First: KEITH	Middle: RAYMOND	Last: BROWN

(for others) for each application they filed. Marsha Oaks (Oak's sister in law) was sending Oaks names as was her son Corey Oaks, her nephew Jack Morris, her daughter Angela Hoffman, and Kim Powe. Slade said that sometime around October 2020, Oaks called her and told her that Robinson was in the hospital, left the hospital and eventually died. Slade also knew that Oaks was dealing with Robinson's boyfriend, Keith (aka Killer). Slade said she prepared between forty (40) and fifty (50) PUA Claims. Slade identified four (4) PUA claims she filed while at the Double Tree Hotel using the IP Address of 12.230.204.2. Pennsylvania Dept. of Labor records show that Slade prepared an additional fifty-seven (57) PUA claims at her residence using the IP Address of 24.131.194.173. The total PUA claims filed by Slade is sixty-one (61) and the total of those PUA payouts total \$925,273.

Agents DiLucente, Sweeney and Matthews interviewed approximately thirty (30) individuals that had their PUA applications filed by Oaks and Slade. Although many of the witnesses did not want to cooperate, investigators did speak with several that provided information relative to the filing of their PUA application. A handful of individuals interviewed appear to qualify for the PUA benefits; they include Angelic Lewis (hair stylist), Tyrone Washington (jitney driver), Tameron Jones (Taco Bell), Darnell Adams (ticket scalper), Gerald Colwell (ticket scalper), Lorenzo Towns (cut hair in the neighborhood). All of these individuals received PUA funds and their applications were prepared by either Slade or Oaks. Another group of people interviewed Cheryl Boswell, Rosalyn Burton, and Samuel Kyles all stated that they don't know Slade or Oaks, never filed a PUA application and never received any PUA money. PA Dept. of Labor records indicate that all three of these individuals received PUA benefits and their applications were prepared by either Slade or Oaks. A third group of individuals interviewed provided information that clearly shows the disregard for the PUA application process by both Oaks and Slade. Inell Dixon (age 75) met Slade through her friend Jennifer Simmons. Dixon said that Simmons refers to Slade as her daughter (although they are not biologically related). Simmons gave Slade Inell Dixon's home phone number, Slade called Dixon and told her that "there is all this money out there and everyone is getting it". Dixon asked Slade if it was legal to apply for this money and Slade said "Yes, all the white people are getting it so why shouldn't we". Slade asked Dixon for her SSN, address and cell phone number. Dixon was never asked about her employment history nor was she asked if she was unemployed due to the Pandemic. Dixon told investigators that she didn't know this money was related to unemployment because she knew she wouldn't qualify. Slade charged Dixon \$1,000 cash to file her PUA application and also offered to file her weekly updates to her application for an additional \$100 per month. Slade did the weekly updates for two months then stopped. Sometime in the fall, Slade contacted Dixon and told her that two white guys visited Jennifer Simmons (same apartment complex as Dixon) and they were asking questions about PUA applications. At this time Slade asked Dixon if she worked and Dixon said no. Slade told Dixon that if anyone asks, tell them you babysit your grandchildren. Additional individuals; Allen Travillion (age 74 last employed 6 years ago), Pierre Brown (age 68 last employed 8 years ago), Sandra Washington (age 74 last employed several years ago), Vanessa Washington (age 65 last worked 6 years ago), Latrese Jones (age 39 still employed and worked thru the pandemic), Jerome Davis (age 69 hasn't worked in 25 years, disabled), James McArthur (age 85 retired hasn't worked in 20 years), Melvin Walker (age 59 hasn't worked in 5 years), Diana Andrews (age 75 hasn't worked in 11 years), Ivy Wofford (age 72, retired hasn't worked in 25 years), and Wilford McCoy (age 64 hasn't worked in 4 years) all provide similar testimony. They all confirmed that either Slade or Oaks prepared their PUA applications, they all received PUA money, they haven't worked in several years and were not qualified, they were not asked specific questions about their work history and were not asked if they were unemployed due to the Pandemic. After reviewing these PUA applications it was determined that the preparers, both Slade and/or Oaks answered the question "Are you unemployed as a direct result of a pandemic or major disaster" with a "Yes" answer indicating that these individuals were all unemployed due to the Pandemic. Even though they knew or should have known the employment circumstances of the individuals your affiant met with to interview on this case.

## CONCLUSION

Records received from the PA Dept. of Labor at this point show that Oaks prepared (31) PUA Applications producing \$249,227 in payments and Slade prepared (61) PUA applications producing \$925,273. It is believed that Oaks prepared many more applications that have not been documented to date. In addition, records received showed that Stacy Robinson (now deceased) prepared (81) known applications. The details of these records have been requested but not yet received. It is clear that \$1,174,500 was paid out by the PA Dept. of Labor just for the combined (92) application prepared by Oaks and Slade. It is estimated that the eventual total for all applications prepared by Oaks, Slade and Robinson will exceed \$2 million. In addition it



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should be noted that the majority of the individuals (over 70%) whose applications were prepared in this case either had no work history with the PA Dept. of Labor and/or did not qualify for PUA benefits. The text messages between Oaks and Keith Brown further illustrate the efforts that were taken to facilitate this conspiracy between Oaks, Slade, Brown and Robinson. After investigators began interviewing PUA claimants, at least one person (Inell Dixon) was contacted by Slade and instructed to lie about their employment history if approached by anyone. Based upon the aforementioned facts contained herein, and a combination of your Affiants' training, education and experience, and knowledge of this investigation, your Affiants believe that Oaks and Slade committed the following PA Crimes Code violations as listed: PACC 911(B3) Corrupt Organization, PACC 911(B4) Corrupt Organization, PACC 903(A1) Conspiracy, PACC 3921(A) Theft by Unlawful Taking, PACC 3922(A1) Theft by Deception, grading a Felony of third degree due to a disaster (Pandemic) and PACC 4911 (A1) Tampering with Public Records or Information.

I, JOHN DILUCENTE, 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.

/JOHN DILUCENTE/

(Signature of Affiant)

Sworn to me and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_,

\_\_\_\_\_ Date \_\_\_\_\_, Magisterial District Judge

My commission expires first Monday of January,

