

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: FRANKLIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 39-3-07
MDJ: Hon. Kelly L. Rock
Address: 2038B Lincoln Way East
Chambersburg, PA 17201

DEFENDANT:

(NAME and ADDRESS):

KERRY LEE BUMBAUGH
First Name Middle Name Last Name

Ge
n

8515 Fox Hill Road
Waynesboro, PA 17268

Telephone: (717)263-5820

NCIC Extradition Code Type

| | | | |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full | <input type="checkbox"/> 5-Felony Pending Extradition | <input type="checkbox"/> C-Misdemeanor Surrounding States | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition | |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full | <input type="checkbox"/> E-Misdemeanor Pending Extradition | |
| <input type="checkbox"/> 4-Felony No Extradition | <input type="checkbox"/> B-Misdemeanor Limited | <input type="checkbox"/> F-Misdemeanor Pending Extradition | |

DEFENDANT IDENTIFICATION INFORMATION

| | | | | |
|---|--|---|--|---|
| Docket Number CR 134-21 | Date Filed 05/26/2019 | OTN/LiveScan Number R 141113-0 | Complaint/Incident Number 36-707 | Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO |
| GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female | DOB 10/07/1964 | POB US | Add'l DOB / / | Co-Defendant(s) <input type="checkbox"/> |
| First Name AKA | | Middle Name | Last Name | Gen. |
| RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown | ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown | | | |
| Hair Color <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLN (Blonde / Strawberry) | <input type="checkbox"/> RED (Red/Aubn.) | <input type="checkbox"/> SDY (Sandy) | <input type="checkbox"/> BLU (Blue) | <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) |
| Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) | <input type="checkbox"/> BLU (Blue) | <input checked="" type="checkbox"/> BRO (Brown) | <input type="checkbox"/> GRN (Green) | <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown) |
| DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | DNA Location | | | WEIGHT (lbs.) 170 |
| FBI Number | MNU Number | | | Ft. HEIGHT In. 5 8 |
| Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | Fingerprint Classification: | | | |

DEFENDANT VEHICLE INFORMATION

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

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

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

SDAG MEGAN MADAFFARI

(Name of the attorney for the Commonwealth)

(Signature)
(Signature of the attorney for the Commonwealth)

05/24/21
(Date)

I, **SA PAUL DORMER AND FBI SA BRUCE DOUPE**
(Name of the Affiant)

803 / 18982
(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of **Pennsylvania Office of Attorney General**
(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

PA0222400
(Police Agency ORI Number)

1. I accuse the above named defendant who lives at the address set forth above

I accuse the defendant whose name is unknown to me but who is described as _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [211] **Quincy Township**
(Subdivision Code) (Place-Political Subdivision)

in **FRANKLIN** County **[28]** on or about **JULY 2017 THROUGH PRESENT**
(County Code)

 **POLICE CRIMINAL COMPLAINT**

| | | | |
|-----------------|-----------------|---------------------|-------------------------------------|
| Docket Number: | Date Filed: / / | OTN/LiveScan Number | Complaint/Incident Number 36-707 |
| Defendant Name: | First: KERRY | Middle: LEE | Last: BUMBAUGH |

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.)

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

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| <input checked="" type="checkbox"/> | 1 | 1103 | (a) | of the | 65 P.S. | 2 | F | NCIC Offense Code | UCR/NIBRS Code |
| Lead? | Offense # | Section | Subsection | | PA Statute (Title) | Counts | Grade | | |

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|---|-----------------------|-------------------------------------|--------------------------------------|------------------------------------|
| <input type="checkbox"/> 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): **CONFLICT OF INTEREST**

Acts of the accused associated with this Offense: In that the Defendant, as a public official or public employee, used the authority of his office or employment or any confidential information received through his holding public office or employment for the private pecuniary benefit of himself, a member of his immediate family or a business with which he or a member of his immediate family is associated. TO WIT: in 2018 the Defendant used his position as Quincy Township Supervisor to obtain a pecuniary benefit by directing township employees to perform work on his personal property at no expense to the Defendant. Additionally, the Defendant again used his position for pecuniary gain in 2019 when he used township funds to compensate an outside contractor to perform paving work at his personal residence.

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|---|--|---|---|---|
| <input type="checkbox"/> Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> | 2 | 3926 | (b) | of the | 18 PA.C.S. | 2 | F3 | NCIC Offense Code | UCR/NIBRS Code |
| Lead? | Offense # | Section | Subsection | | PA Statute (Title) | Counts | Grade | | |

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|---|-----------------------|-------------------------------------|--------------------------------------|------------------------------------|
| <input type="checkbox"/> PennDOT Data (if applicable) | Accident Number _____ | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
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Statute Description (include the name of statute or ordinance): **THEFT OF SERVICES - DIVERSION**

Acts of the accused associated with this Offense: In that the Defendant, having control over the disposition of services of others to which he is not entitled, knowingly diverted such services to his own benefit or to the benefit of another not entitled thereto. TO WIT: In July 2018 and August 2018, the Defendant directed township employees to perform work on his personal residence during regular work hours while they were being paid by Quincy Township. In addition, in July of 2019, the Defendant directed township employees to direct traffic at his residence during regular work hours while they were being paid by Quincy Township, while his personal residence was being paved.

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| <input type="checkbox"/> Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> | 3 | 3921 | (a) | of the | 18 PA C.S.A. | 2 | F3 | NCIC Offense Code | UCR/NIBRS Code |
| Lead? | Offense # | Section | Subsection | | PA Statute (Title) | Counts | Grade | | |

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|---|-----------------------|-------------------------------------|--------------------------------------|------------------------------------|
| <input type="checkbox"/> PennDOT Data (if applicable) | Accident Number _____ | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
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Statute Description (include the name of statute or ordinance): **THEFT BY UNLAWFUL TAKING OR DISPOSITION**

Acts of the accused associated with this Offense: In that the Defendant did unlawfully take, or exercise unlawful control over, movable property of another with intent to deprive him thereof. TO WIT: In 2018 and 2019, the Defendant directed the paving of his personal residence, where the materials used for the projects were billed to and paid by Quincy Township, and where the cost of said materials was in excess of \$2,000.



POLICE CRIMINAL COMPLAINT

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| Defendant Name: | First: KERRY | Middle: LEE | Last: BUMBAUGH |

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|------------------|--|---|---|---|
| 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"/> | 4 | 3922 | (a)(1) | of the | 18 PA C.S.A. | 3 | F3 | | |
| Lead? | Offense# | Section | Subsection | | PA Statute (Title) | Counts | Grade | NCIC Offense Code | UCR/NIBRS Code |

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

Acts of the accused associated with this Offense: In that the Defendant did knowingly or intentionally obtain or withhold property of another by intentionally creating or reinforcing a false impression, including false impressions as to law, value, intention or other state of mind. TO WIT: On June 24, 2018, the Defendant intentionally submitted a false document to Selective Insurance in order to received \$94,270.95. On August 11, 2020, the Defendant intentionally submitted a fraudulent invoice to Franklin County Conservation District in order to receive grant funding in excess of \$2,000. On June 30, 2020, the Defendant provided a fraudulent invoice to the Estate of Kenneth N. Henson Jr. where the amount overbilled and paid was in excess of \$2,000.

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| Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> | 5 | 4117 | (a)(2) | of the | 18 PA C.S.A. | 1 | F3 | | |
| Lead? | Offense# | Section | Subsection | | PA Statute (Title) | Counts | Grade | NCIC Offense Code | UCR/NIBRS Code |

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

Acts of the accused associated with this Offense: In that the Defendant did knowingly and with intent to defraud any insurer or self-insured, presented or caused to be presented to any insurer or self-insured any statement forming a part of, or in support of, a claim that contains any false, incomplete or misleading information concerning any fact or thing material to the claim. TO WIT: The Defendant intentionally provided a fraudulent document to Selective Insurance in support of an insurance claim to obtain benefits under the policy to which he was not entitled to receive.

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| 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"/> | 6 | 4101 | (a)(2) | of the | 18 PA C.S.A. | 1 | F3 | | |
| Lead? | Offense# | Section | Subsection | | PA Statute (Title) | Counts | Grade | NCIC Offense Code | UCR/NIBRS Code |

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

Acts of the accused associated with this Offense: In that the Defendant did, with intent to defraud or injure anyone, or with knowledge that he was facilitating a fraud or injury to be perpetrated by anyone, made, completed, executed, authenticated, issued or transferred any writing so that it purported to be the act of another who did not authorize that act, or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed. TO WIT: in 2018 the Defendant knowingly created and provided a fraudulently authenticated official document to Selective Insurance, where said document was purported to be signed and notarized in 2013.



POLICE CRIMINAL COMPLAINT

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| Defendant Name: | First: KERRY | Middle: LEE | Last: BUMBAUGH |

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| <input type="checkbox"/> Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> Lead? | 7 | 4911 | (a)(2) | of the | 18 PA C.S.A. | 2 | F3 | NCIC Offense Code | UCR/NIBRS Code |
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| PennDOT Data (if applicable) | Accident Number | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS**

Acts of the accused associated with this Offense: In that the Defendant did, present or use any record, document or thing knowing it to be false, and with intent that it be taken as a genuine part of information or any record, document or thing belonging to, or received or kept by the government for information or record, or required by law to be kept by others for information of the government. TO WIT: The Defendant knowingly submitted fraudulent invoices to the Franklin County Conservation District relative to Quincy Township's receipt of Dirt, Gravel, and Low Volume Road Maintenance Grant funds. Additionally, the Defendant knowingly submitted fraudulent invoices to the Pennsylvania Department of Transportation relative to Quincy Township's receipt of Municipal Liquid Fuels funds.

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| <input type="checkbox"/> Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> Lead? | 8 | 4104 | (a) | of the | 18 PA C.S.A. | 2 | M1 | NCIC Offense Code | UCR/NIBRS Code |
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| PennDOT Data (if applicable) | Accident Number | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
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Statute Description (include the name of statute or ordinance): **TAMPERING WITH RECORDS OR IDENTIFICATION**

Acts of the accused associated with this Offense: In that the Defendant, knowing that he has no privilege to do so, falsified, destroyed, removed or concealed any writing or record, or distinguishing mark or brand or other identification with intent to deceive or injure anyone or to conceal any wrongdoing. TO WIT: The Defendant falsified and submitted a fraudulent document to Selective Insurance with intent to obtain a benefit that he was not entitled to receive. Additionally, the Defendant falsified and provided a fraudulently inflated invoice to the Estate of Kenneth N. Henson Jr. with intent to obtain payment that Quincy Township was not entitled to receive.

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| <input type="checkbox"/> Inchoate Offense | <input checked="" type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> Lead? | 9 | 4910 | (1) | of the | 18 PA C.S.A. | 1 | M2 | NCIC Offense Code | UCR/NIBRS Code |
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| PennDOT Data (if applicable) | Accident Number | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
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Statute Description (include the name of statute or ordinance): **CRIMINAL ATTEMPT - TAMPERING WITH OR FABRICATING PHYSICAL EVIDENCE**

Acts of the accused associated with this Offense: In that the Defendant, believing that an official proceeding or investigation was pending or about to be instituted, Defendant altered, destroyed, concealed or removed any record, document or thing with intent to impair its verity or availability in such proceeding or investigation. TO WIT: The Defendant, with intent to commit the crime of tampering with or fabricating physical evidence; instructed a township employee to destroy log books or alter entries, knowing that a search warrant had been executed on Quincy Township offices and that an official criminal investigation was underway.



POLICE CRIMINAL COMPLAINT

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| Defendant Name: | First: KERRY | Middle: LEE | Last: BUMBAUGH |

| | | | | |
|------------------|--|---|---|---|
| Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
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| <input type="checkbox"/> | 10 | 4114 | | of the | 18 PA C.S.A. | 1 | M2 | | |
| Lead? | Offense# | Section | Subsection | | PA Statute (Title) | Counts | Grade | NCIC Offense Code | UCR/NIBRS Code |

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|------------------------------|-----------------|--|-------------------------------------|--------------------------------------|------------------------------------|
| PennDOT Data (if applicable) | Accident Number | | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
|------------------------------|-----------------|--|-------------------------------------|--------------------------------------|------------------------------------|

Statute Description (include the name of statute or ordinance): **SECURING EXECUTION OF DOCUMENTS BY DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant knowingly and deceptfully caused another to execute any instrument affecting or purporting to affect or likely to affect the pecuniary interest of any person. TO WIT: The Defendant caused Vicki Nunemaker and Corey Kaiser to execute a fraudulent document in order to fraudulently obtain an insurance benefit.

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| 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 |

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

Acts of the accused associated with this Offense:

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|------------------|--|---|--|---|
| 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"/> | | | | of the | | | | | |
| Lead? | Offense# | Section | Subsection | | PA Statute (Title) | Counts | Grade | NCIC Offense Code | UCR/NIBRS Code |

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|------------------------------|-----------------|--|-------------------------------------|--------------------------------------|------------------------------------|
| PennDOT Data (if applicable) | Accident Number | | <input type="checkbox"/> Interstate | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
|------------------------------|-----------------|--|-------------------------------------|--------------------------------------|------------------------------------|

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

| | | | |
|-----------------|--------------------|---------------------|-------------------------------------|
| Docket Number: | Date Filed: / / | OTN/LiveScan Number | Complaint/Incident Number 36-707 |
| Defendant Name: | First: KERRY | Middle: LEE | Last: BUMBAUGH |

- 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 9.
- 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.)

SA Paul J. D'Amico R
SA Bruce C. D'Amico
 (Signature of Affiant)

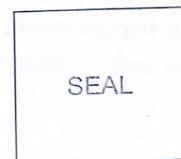
(Date) May 26 (Year) 2021

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.

39-3-07
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

| | | | |
|-----------------|-----------------|---------------------|-------------------------------------|
| Docket Number: | Date Filed: / / | OTN/LiveScan Number | Complaint/Incident Number 36-707 |
| Defendant Name: | First: KERRY | Middle: LEE | Last: BUMBAUGH |

AFFIDAVIT of PROBABLE CAUSE

A. Your Affiants, Paul Dormer, Special Agent of the Pennsylvania Office of Attorney General (PA OAG) and Bruce Doupe, Special Agent of the Federal Bureau of Investigation and specially deputized as a Special Agent for the PA OAG, being duly sworn, depose and say;

B. Your Affiants have been conducting a criminal investigation into violations of the criminal laws of the Commonwealth of Pennsylvania. This investigation has used the resources of the Forty-Fifth Statewide Investigating Grand Jury. On May 17, 2021, the Forty-Fifth Statewide Investigating Grand Jury issued Presentment Number 19. On May 17, 2021, the Honorable Richard A. Lewis, Supervising Judge, entered a court order accepting the Grand Jury's recommendation of charges and findings. The Presentment, attached and herein incorporated by reference, recommends that the Attorney General of Pennsylvania or his designee file the charges specified in this criminal complaint and Presentment Number 19 against the following individual:

Kerry Lee Bumbaugh

C. Your Affiants believe through participation in this investigation and as recommended by the Forty-Fifth Statewide Investigating Grand Jury that probable causes exists for the arrest of the above named party and respectfully ask this honorable court to issue an arrest warrant for the above named party so that he maybe be brought before this court to answer to the charges set forth herein.



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I, SA PAUL DORMER AND FBI SA BRUCE DOUPE, 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.

SA Paul Dormer

SA Bruce Doupe

(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____

_____ Date _____, Magisterial District Judge

My commission expires first Monday of January,

