

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-2-04
MDJ: Hon. Joann L. Teyral
Address: 1805 North Cameron Street
Harrisburg, PA 17103

Telephone: (717)233-3599



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

DORIEN

ERVIN

First Name

Middle Name

Last Name

1017 Topview Dr
Harrisburg, PA 17112

Ge
n

NCIC Extradition Code Type

<input checked="" type="checkbox"/> 1-Felony Full	<input type="checkbox"/> 6-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 CP-211-21	Date Filed 07/29/2021	OTN/LiveScan Number R-159807-1	Complaint/Incident Number FCC-21-0004-1	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 02/06/2000	POB	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA				
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <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 type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number			Ft. HEIGHT In.
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				5 6
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).

MEGAN MADAFFARI

(Name of the attorney for the Commonwealth)

Megan
(Signature of the attorney for the Commonwealth)

07/29/2021

(Date)

I, **KATHRYN GRADY**

(Name of the Affiant)

590

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

of **Pennsylvania Office of Attorney General**

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about May 26, 2020 through March 22, 2021



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

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 checked="" 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"/> Lead?	1	3921	A	on the	18 PA C.S.A.	1	F2		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

<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**

Acts of the accused associated with this Offense: In that the Defendant, took or exercised unlawful control over, movable property of another with intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. TO WIT: Dorien Ervin, during the COVID-19 State of Emergency, filed fraudulent applications for Pandemic Unemployment Assistance benefit program through the PA Department of Labor and Industry website for himself and others, knowing that he was not qualified to do so, and were the fraudulent applications resulted in benefit payments of approximately \$147,250.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	2	3921	A	on the	18 PA C.S.A.	1	F2		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

<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): **CONSPIRACY - THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: In that the Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Unlawful Taking or Disposition, Title 18 Section 3921(a), agree with one or more persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime. TO WIT: Dorien Ervin, during the COVID-19 State of Emergency, agreed with Kymaury Goldsby, Tyreese Lewis, and/or other identified co-conspirators, that they, or one or more of them, would engage in conduct constituting the crime of theft by taking, in violation of Title 18, and in pursuance of such conspiracy one or more overt acts were committed.

<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?	3	3922	A2	on the	18 PA C.S.A.	1	F3		
Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

<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 DECEPTION**

Acts of the accused associated with this Offense: In that the Defendant, did intentionally obtain property of another by deception by creating a false impression, including false impressions as to law, value, intention or other state of mind. TO WIT: Dorien Ervin intentionally file fraudulent applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself and others, knowing that he was not qualified to do so and that the information provided was false, and where the Defendant certified on the application that the information provided was true and correct, and where the fraudulent applications resulted in benefit payments of approximately \$147,250.



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/> Lead?	4	3922	A2	of the	18 PA C.S.A.	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: In that the Defendant did, with the intent of promoting or facilitating the commission of the crime of Theft by Deception, agree with one or more other persons that they or one or more of them would engage in conduct which constitutes a crime or did agree to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime. TO WIT: Dorlen Ervin agreed with Kymaury Goldsby, Tyreese Lewis, and/or other identified and unidentified co-conspirators, that they, or one or more of them, would engage in conduct constituting the crime of theft by unlawful taking, and in pursuance of such conspiracy one or more over acts were committed.

<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?	5	4106	A1iv	of the	18 PA C.S.A.	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

Acts of the accused associated with this Offense: In that the Defendant used an access device to obtain or in an attempt to obtain property or services with knowledge that his use of the access device is unauthorized by the issuer or device holder. TO WIT: Dorlen Ervin used personal information of other individuals in order to fraudulently receive Pandemic Unemployment Assistance benefits, where said benefits were in excess of \$500, and were issued to an accessed by the Defendant using a US Bank debit card.

<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 _____
---	---	--	--	---

<input type="checkbox"/> Lead?				of the					
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

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

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

Acts of the accused associated with this Offense:

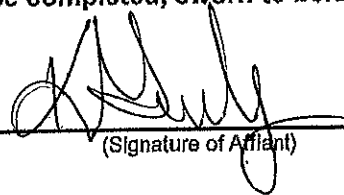


POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

- 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 3.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.
(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

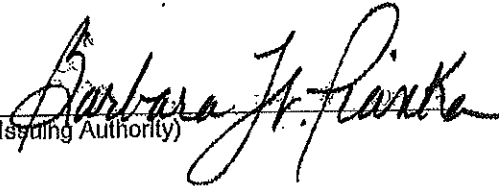


 (Signature of Affiant)

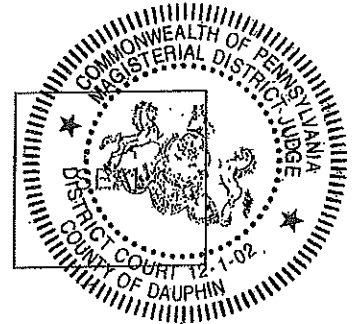
(Date) _____ (Year) _____
 AND NOW, on this date 7/29/21 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

12-1-02

 (Magisterial District Court Number)



 (Issuing Authority)





Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Kathryn Grady of the Pennsylvania Office of Attorney General (OAG), being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Kathryn Grady, is a Special Agent employed by the Pennsylvania Office of Attorney General, Bureau of Criminal Investigation, and is empowered by law to conduct investigations and make arrests relating to white-collar crimes, theft, fraud, and other violations of Pennsylvania Law. Your Affiant currently holds the designation of "Certified Fraud Examiner" and has conducted numerous investigations involving financial crimes. Your Affiant has received training in electronic surveillance by the Pennsylvania State Police in accordance with the Pennsylvania Wiretapping and electronic Surveillance Control Act. This training resulted in the issuance of a class "A" certification, authorizing your Affiant to conduct criminal investigations using various wiretapping equipment, as authorized by Chapter 57 of the Pennsylvania Crimes Code. Your Affiant was certified to employ such techniques while conducting criminal investigations, maintaining "A" certification number A-5948. Your Affiant has been so employed since January 2018 and is currently assigned to the Financial Crime Section in Harrisburg, Pennsylvania. Prior to employment with the Pennsylvania Office of Attorney General, your Affiant was employed as a Security Investigator at First National Bank of Pennsylvania (formerly Metro Bank) and conducted fraud investigations with the Pennsylvania Office of Inspector General.

Based upon your Affiant's law enforcement experience and training, your Affiant is familiar with the manner in which various crimes are committed in the Commonwealth relating to public corruption, white collar crimes, theft and fraud. Based upon the foregoing training and experience, your Affiant has special expertise regarding the practices of, and techniques used by, these offenders.



POLICE CRIMINAL COMPLAINT

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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 (L&I) administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According to L&I's website, the following groups are explicitly defined as being ineligible to receive PUA: "Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, L&I's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, the Pennsylvania Office of Attorney General (OAG) 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 L&I.



POLICE CRIMINAL COMPLAINT

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III. INVESTIGATION

The OAG received information in reference to alleged fraudulent PUA benefit filings involving an individual identified as Tyreese Lewis. A Dauphin County probation officer, who supervised Lewis and actively monitored his Facebook and Instagram accounts, contacted your Affiant and provided information that Lewis appeared to be attempting to recruit individuals for the purpose of filing PUA benefit applications on their behalf on social media. Lewis's social media accounts were identified on Instagram and Facebook. The usernames for Lewis were identified as "bubba.trnch," "bubba.trnch.7," and "bubba.za."

Your Affiant reviewed the following Instagram story posted by Lewis under username "bubba.trnch" on August 19, 2020: "*If you did pa pua an they paid the weeks an you never got your card hit me ASAP.*" The background of the message contained a screen shot of L&I's website, which included filing dates, the transaction identification number, and the weekly claim amounts. The transaction identification numbers, which are internal numbers assigned by L&I to identify and track applications, were 1991218 and 1856477. Your Affiant also reviewed a similar post on Facebook made by Lewis under username "bubba.trnch.7" on September 13, 2020. The background of the post was a copy of an e-mail sent by L&I in order to notify the recipient (the recipient's email address was blocked) that claim weeks ending for August 1, August 8, and August 15 were available for submission under the PUA program.

Further, on August 18, 2020, under Facebook username "bubba.za", Lewis posted a screen shot of an application for a COVID-19 Economic Injury Disaster Loan Application. The caption on this post stated "*Hit Me ASAP if you wanna make this free money.*" The COVID-19 Economic Injury Disaster Loans (EIDL) are administered by the U.S. Small Business Administration. The purpose of the EIDL is to provide economic relief to small businesses and nonprofit organizations that are currently experiencing a temporary loss of revenue to the pandemic.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number: FCC-21-0004
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IV. FRAUDULENT PUA APPLICATIONS

a. Application Information

The PA Department of Labor and Industry provided your Affiant with PUA claim documentation related to the identification numbers 1991218 and 1856477, which were shown in Lewis's August 19, 2020 social media post. According to the records, these identification numbers correspond to a PUA application that was submitted on June 22, 2020 using a social security number belonging to Israel Blankenship. The IP address used to submit the application was 73.130.137.208. Blankenship is a Kentucky resident and has no known connection to Pennsylvania. Your Affiant learned that, while PUA benefits were issued for this application, the funds were never withdrawn. However, the investigation revealed that the IP address used for this application was identical to the IP address on six other applications, including an application for Tyreese Lewis.

Lewis's application was submitted on June 5, 2020. From June 11, 2020 to February 24, 2021, Lewis received \$12,450 in benefits. Your Affiant requested information pertaining to Lewis's employment history in order to verify the validity of his application. Your Affiant learned that Lewis last worked in the third quarter of 2019. Based on the qualification requirements, Lewis would not have been tied to the job market, and therefore ineligible to receive PUA benefits.

In addition to Lewis's own fraudulent application, multiple other PUA benefit applications believed to be linked to Lewis were identified based on the same IP address, mailing address, email address, or telephone number submitted on the applications. Further, a review of additional PUA applicant information, bank records, and surveillance video identified two additional individuals – Kymaury Goldsby and Dorien Ervin – as participating in the activity surrounding the fraudulent applications. The records show that these applications and payments for PUA benefits were submitted between May 26, 2020 and January 25, 2021. The applications are identified below in TABLE 1.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
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TABLE 1

Date/Time of Application	Name of Applicant	Mailing Address	Phone Number	Registration IP Address	Total Funds Received
5/26/2020	Dorien Ervin	1017 Topview Drive, Harrisburg, PA 17112	717-857-4485	73.130.129.61	\$20,900
6/5/2020	Tyreese Lewis	821 Squire Rd, Harrisburg, PA 17111	717-704-6397	73.130.137.208	\$20,550
6/5/2020	Danielle Watlington	301 N Progress Ave, H3, Harrisburg, PA 17109	717-599-4687	73.130.137.208	\$26,865
6/5/2020	Kymaury Goldsby	5 Jury Street, Highspire, PA 17034	717-914-7362	73.130.137.208	\$3,975
6/9/2020	Zyaire Monesratt	2445 Walnut Street, B, Harrisburg, PA 17113	717-356-0407	73.130.137.208	\$12,690
6/20/2020	Julian Jackson	114 Radle Rd, Harrisburg, PA 17112	717-425-8870	73.130.137.208	\$8,915
6/20/2020	Jaire Cotton	223 N 40 th Street, Apt 101, Harrisburg, PA 17111	717-992-5477	98.235.217.52	\$13,800
6/22/2020	Isreal Blankenship	301 N Progress Ave, H3, Harrisburg, PA 17109	717-316-5625	73.130.137.208	\$17,475
6/29/2020	Mack Damani	301 N Progress Ave, H3, Harrisburg, PA 17109	443-405-2952	107.77.203.170	\$0
7/2/2020	Jessika Baker	301 N Progress Ave, H3, Harrisburg, PA 17109	443-405-2952	73.130.137.208	\$0
7/15/2020	Brittney Hutchins	301 N Progress Ave, H3, Harrisburg, PA 17109	443-405-2952	96.240.151.154	\$0
7/16/2020	Coy Thompson	193 S Front Street, Apt 4, Harrisburg, PA 17113	717-210-2148	73.130.137.208	\$22,080
7/17/2020	Robert Burgos	301 N Progress Ave, H3, Harrisburg, PA 17109	412-637-4456	73.130.137.208	\$0
7/17/2020	Marle Delfin	301 N Progress Ave, H3, Harrisburg, PA 17109	223-443-5567	73.130.137.208	\$0

Your Affiant believes that, similar to the Blankenship application identified in Lewis's social media post, several of the applications linked to Lewis were filed without the knowledge or permission of the applicant. Specifically, the application submitted on July 15, 2020 using a name and social security number belonging to Brittney Hutchins, lists the address of 301 N. Progress Ave, H3, Harrisburg, PA. Hutchins is a Maryland resident with no work history or identifiable connection to Pennsylvania. The application for Jessica Baker, which lists the same address - 301 N. Progress Ave, H3, Harrisburg, PA - was submitted with a social security number belonging to a Jackie Hohney of



POLICE CRIMINAL COMPLAINT

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San Diego, California. Your Affiant spoke with Coy Thompson, who confirmed that he did not apply for PUA benefits and had no knowledge of the filing. Thompson stated he currently collects Veteran Affairs benefits because he is disabled. The IP address used for the applications of Blankenship, Baker, and Thompson is the same as that of both Lewis and Goldsby.

Your Affiant made contact with the property manager for the apartment complex at 301 N. Progress Avenue, H3, Harrisburg, PA. According to the property manager, Danielle Watlington was a resident of the apartment during the time of the PUA applications. An application in Watlington's name was submitted on June 5, 2020, on the same date and with the same IP address as the applications for Lewis and Goldsby. However, at no time did any of the other individuals identified in TABLE 1 reside at that location.

b. Financial Records / Surveillance Video

Your Affiant reviewed the payout information for each application as provided by L&I. Upon approval, the initial payment would be made via check, and the remaining payouts were disbursed through Electronic Funds Transfer (EFT) or check payments. The applicant would determine the preferred method of disbursement. In June 2020, the PA Department of Treasury made the decision to issue US Bank Debit Cards for all approved payments. The US Bank Debit Cards work like a pre-paid card, the applicants can only use the funds available based on approved disbursements by L&I. The PA Department of Treasury provided your Affiant with the last four digits of the debit cards issued to the applicants outlined in TABLE 1. Baker is the only applicant who did not have a debit card issued.

Your Affiant reviewed the transaction logs provided by US Bank for the applications identified in the investigation. Your Affiant identified several financial accounts which were attached to the PUA benefits. Lewis indicated on his PUA benefit filing that the funds could be directly deposited into Members 1st Federal Credit Union



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
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bank account 717878, an account verified as belonging to Tyreese Lewis. A review of the US Bank records revealed that debit cards issued to both Lewis and Watlington transferred funds to Members 1st FCU bank account 717878.

The US Bank ACH detail records for Watlington's account identified additional ACH transfers to financial accounts identified as follows: Tadena, Wells Fargo Bank Account Number 7215774071 and Andrew, Cash App account number 1315354241649. Records revealed Cash App account number 1315354241649 is owned by Tyreese Lewis, with additional display names of Andrew Swanger and Champ Kimbell. Your Affiant reviewed records for Wells Fargo Bank account 7215774071, which is owned by a Tadena Glascoe. Glascoe's monthly statements are mailed to 347 N Railroad Street, Palmyra, PA 17038. On February 10, 2021, Glascoe attempted to make two wire transfers to Tyreese Lewis's Members 1st Federal Credit Union account 717878. The wire transfers were for \$1,800 and \$1,500 respectively. The transfers were cancelled and the funds withdrawn from the account through ATM withdrawals in the Philadelphia, PA area. These withdrawals correlate with the same locations of ATM withdrawals from Lewis's Members 1st Federal Credit Union account.

The US Bank ACH detail records for an application submitted in the name of Zyaire Monserrat show transactions to Cash App account numbers 1309358053282 and 13929436242590. There were no names associated with these account numbers, the description is listed as "Cash App Personal Checking". Additionally, Cash App account number 13929436242590 was provided on fraudulent EIDL application information for PUA fraud victim Brittney Hutchins (outlined in a subsequent section of this affidavit).

Your Affiant was able to obtain video surveillance from some of the US Bank debit card transactions between June 28, 2020 and February 24, 2021 which occurred at Sheetz in the greater Harrisburg area. Your Affiant identified Lewis has having accessed funds for the US Bank debit card issued for his claim, as well as for the claim of Danielle Watlington. Your Affiant also identified a second individual, Dorien Ervin, as using the US Bank debit card issued to Coy Thompson. In addition to footage of fund withdrawals for Thompson, Ervin also withdrew funds linked to



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

his own account. Your Affiant learned that Ervin applied for PUA benefits on May 26, 2020. According to Labor and Industry records, Ervin last worked for Arooga's in the first quarter of 2020. Your Affiant confirmed with Arooga's, Ervin's last date of employment was February 28, 2020, which was prior to the restaurant shutting down due to COVID.

Your Affiant also identified a third individual, Kymaury Goldsby, who is seen in video surveillance using the debit card that was issued to Zyaire Monsserat. Goldsby applied for PUA benefits on the same date as Lewis - June 5, 2020 – from the same IP address. Your Affiant discovered Goldsby was employed during the second quarter of 2020 at Chipton Ross Staffing Agency. Your Affiant spoke with a representative from Chipton Ross Staffing who confirmed Goldsby was briefly employed with them and was not laid off due to COVID.

c. Social Media

Your Affiant obtained and reviewed social media records connected to Lewis from Facebook, Inc. Throughout the time of the fraudulent applications, Lewis sends and receives numerous messages to multiple other users relating to obtaining identifications to use for filing fraudulent PUA benefit claims, with one specific reference to using identities of California residents. Additionally, Lewis appears to provide advice and/or assistance to others in submitting fraudulent PUA claims, some of which provide Lewis with the personal identification information for individuals that your Affiant confirmed had applications submitted in their names.

Specifically, in a message sent by Lewis on July 10, 2020, he identifies his address as 193 S. Front Street, Harrisburg – the address used to file PUA benefit claims for Coy Thompson. On August 11, 2020, Lewis sent a video message through his Instagram account "bubba.trnch" to user "lilrekk". The video message shows stacks of cash with the caption, *"If you did PENNSYLVANIA UNEMPLOYMENT ALLYA WEEKS GIT PAID BUT YOU NEVER GOT YA CARD HIT ME ASAP BRO"*.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

On September 26, 2020, Lewis messaged Instagram user "1gkeemo" in reference to PUA benefit filings. The user "1geekmo" told Lewis he had cards and names for Pennsylvania, California, Arizona, and Michigan.

Your Affiant reviewed additional messages in which individuals reached out to Lewis through Instagram's direct message system seeking direction on filing for PUA benefits. Lewis indicated to these individuals that he could fix any application. Lewis and these individuals also discussed payment for his assistance in filing or fixing the PUA applications. On March 20, 2021, Lewis told user "___linggg0" that if they paid him \$300, he would give them "a real method". Lewis claimed he was making \$10,000 to \$20,000 per month.

d. IP Addresses

Your Affiant compared the IP logs provided by US Bank, Pa. Department of Labor, and Facebook, Inc. and was able to identify matching IP addresses among the claimants on multiple occasions using multiple IP addresses with different subscribers. The initial IP address used to file the majority of the applications was identified as Comcast Cable IP Address 73.130.137.208, for which the subscriber information was no longer available. This IP Address was used to register or access the applications for Ervin, Lewis, Watlington, Goldsby, Monseratt, Jackson, Blankenship, Baker, Thompson, Burgos, and Delfin. Significantly, one of the addresses used to access the benefit accounts of Britney Hutchins, Tyreese Lewis, Kymaury Goldsby, Mack Damani, Courtney Thompson, and Danielle Watlington was Comcast Cable IP address 174.54.220.234. The subscriber for this IP address was identified as Dorien Ervin located at 806 S 27th Street, Harrisburg, PA 17111. Ervin was the individual seen on surveillance footage using the US Bank card assigned to Thompson's PUA claim.

e. US Bank / PUA Registrant Telephone Numbers

Based on records obtained by your Affiant from US Bank and the OIG-SBA, it was determined Lewis used the telephone numbers 717-704-6397 (which was tied to his original PUA application) and 717-443-4747. Lewis began



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number FCC-21-0004
Defendant Name:	First: DORIEN	Middle: T	Last: ERVIN

using telephone number 717-443-4747 on September 20, 2020. Telephone number 717-443-4747 was added to the US Bank records for Watlington after the US Bank issued a debit card for her PUA claim.

V. CONCLUSION

Based on the facts and circumstances of this investigation, and your Affiant's training and experience involving thefts and white collar crime investigations, your Affiant believes that Tyreese Lewis, Dorien Ervin, and Kymaury Goldsby participated in the filing of fraudulent applications for Pandemic Unemployment Assistance benefits. The investigation, which included records provided by the PA DOL, Department of Corrections, Pennsylvania Treasury, and documentation obtained via Search Warrant, revealed Lewis, Ervin, and Goldsby conspired to file approximately 17 applications, to include their own, for persons that were not eligible for the PUA program based on the requirements set forth in the Cares Act. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires, the acknowledgement that any false statements made on the application is a criminal offense. The theft of funds from the fraudulent PUA applications total approximately \$147,250.

The information above is based upon information gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of their knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendants Tyreese Lewis, Dorien Ervin, and Kymaury Goldsby.



POLICE CRIMINAL COMPLAINT

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

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

K. Grady

(Signature of Affiant)

Sworn to me and subscribed before me this 29th day of July 2021
7:29:21 Date Barbara J. Flanck Magisterial District Judge

My commission expires first Monday of January,

