

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF: DAUPHIN
 Magisterial District Number: 12-2-04
 MDJ: Hon. Sonya M. McKnight
 Address: 1805 N Cameron Street
 Harrisburg PA 17103
 Telephone: (717)233-3599



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA

VS.
 DEFENDANT:
 NELSON
 First Name

(NAME and ADDRESS):
 FORNAH
 Last Name

244 Mill St, Darby PA 19023

Ge
 n

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-280-21	Date Filed 10/26/2021	OTN/LiveScan Number R187592-4	Complaint/Incident Number FCE210001	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 06/05/1986	POB Sierra Leone	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name		Middle Name		Last Name
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 checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> BLN (Blonde / Strawberry)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> RED (Red/Aubn.)	<input type="checkbox"/> SDY (Sandy)	<input type="checkbox"/> BLU (Blue)
<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PLE (Purple)
<input type="checkbox"/> BRO (Brown)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray)	<input type="checkbox"/> XXX (Unknown)
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) 175
FBI Number	MNU Number			Ft. HEIGHT In. 5 6
Defendant Fingerprinted <input type="checkbox"/> YES <input 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 V. MADAFFARI
 (Name of the attorney for the Commonwealth)

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

10/22/2021
 (Date)

I, **CLARK MORRIS**
 (Name of the Affiant)

BADGE # 607
 (PSP/MPPOETC -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 [301] **Harrisburg City**
 (Subdivision Code) (Place-Political Subdivision)

in **DAUPHIN** County [22] on or about **JULY 23, 2020 THROUGH AUGUST 25, 2021**
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/26/21	OTN/LiveScan Number	Complaint/Incident Number FCE210001
Defendant Name:	First: NELSON	Middle:	Last: FORNAH

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 type="checkbox"/>	1	5111	A1	of the	18 PA C.S.	1	F1		
Lead?	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): **DEALING IN PROCEEDS OF UNLAWFUL ACTIVITY**

Acts of the accused associated with this Offense: The Defendant conducted financial transactions with knowledge that the property involved represented the proceeds of unlawful activity, and acted with intent to promote the carrying on of the unlawful activity. To wit: the Defendant used US Bank cards issued by the Commonwealth of PA for the fraudulently obtained Pandemic Unemployment Assistance funds to withdraw cash from ATMs and purchase Western Union money orders that were then used to make deposits into his personal bank accounts and make other personal payments.

<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	3921	A	of the	18 PA C.S.	1	F2		
Lead?	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 OR DISPOSITION**

Acts of the accused associated with this Offense: The Defendant took or exercised unlawful control over movable property of another with the intent to deprive him thereof. The Defendant committed the offense during a Natural Disaster involving a catastrophe which results in substantial damage to property, hardship, suffering or possible loss of life. To wit: the Defendant fraudulently applied for Pennsylvania Unemployment Assistance for himself and using the identity of others, took control of funds disbursed by the Commonwealth of Pennsylvania meant to assist those in need due to and during the Covid-19 Pandemic.

<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	4120	A	of the	18 PA C.S.	11	F3		
Lead?	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): **IDENTITY THEFT**

Acts of the accused associated with this Offense: The Defendant possessed or used, through any means, the identifying information of another person without the consent of that other person to further an unlawful purpose. To wit: the Defendant used the personal information of multiple individuals without their consent in order to obtain Pandemic Unemployment Assistance through the PA Department of Labor that resulted in a theft greater than \$100,000 and to file for Unemployment benefits in the state of New Jersey.



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Defendant Name:	First: NELSON	Middle:	Last: FORNAH

<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?	4	7611	A1	of the	18 PA C.S.	1	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): **UNLAWFUL USE OF A COMPUTER**

Acts of the accused associated with this Offense: The Defendant accessed or exceeded authorization to access, alter, damage or destroy any computer, computer system, computer network, computer software, computer program, computer database, World Wide Web site or telecommunication device or any part thereof with the intent to interrupt the normal functioning of a person or to devise or execute any scheme or artifice to defraud or deceive or control property or services by means of false or fraudulent pretenses, representations or promises. To wit: the Defendant used the PA Department of Labor and Industry's website in order to apply for Pandemic Unemployment Assistance using the stolen identities of other, all of whom did not qualify for the funds, and to provide fraudulent information for his own application, resulting in a theft greater than \$100,000.

<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	7512	A	of the	18 PA C.S.	1	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): **CRIMINAL USE OF A COMMUNICATION FACILITY**

Acts of the accused associated with this Offense: The Defendant used a communication facility to commit, cause or facilitate the commission or the attempt thereof of any crime under this title or under the PA Controlled Substance, Drug, Device and Cosmetic Act 64-1972, all of which is in violation of the Title 18 PA CS Section 7512. To wit: the Defendant used a cellular phone and/or other communication devices to fraudulently apply for PUA benefits and to verify the identities of victims.

<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?	6	4106	A1ii	of the	18 PA C.S.	1	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): **ACCESS DEVICE FRAUD**

Acts of the accused associated with this Offense: The Defendant used an access device to obtain or in an attempt to obtain property with the knowledge that the access device was issued to another person who has not authorized its use. To wit: the Defendant used the US Bank cards issued to multiple individuals, all of whom did not qualify for the Pandemic Unemployment Assistance or authorize the use of the access device.



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Docket Number:	Date Filed: 10/26/21	OTN/LiveScan Number	Complaint/Incident Number FCE210001
Defendant Name:	First: NELSON	Middle:	Last: FORNAH

<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"/>	7	4106	A1iv	of the	18 PA.C.S.	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): ACCESS DEVICE FRAUD									
Acts of the accused associated with this Offense: The Defendant used an access device to obtain or in an attempt to obtain property with the knowledge that the use of the access device is unauthorized by the issuer of the access device. To wit: the Defendant used US Bank cards issued to multiple other individuals without their authorization.									

<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"/>	8	4911	A1	of the	18 PA C.S.	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): TAMPERING WITH PUBLIC RECORDS OR INFORMATION									
Acts of the accused associated with this Offense: The Defendant knowingly made a false entry in, or false alteration 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. To wit: the Defendant submitted PUA applications to the PA Department of Labor and Industry which included false information. The falsified information was submitted to defraud the Commonwealth of Pennsylvania of funds meant to assist Pennsylvanians who had lost their income due to the Covid-19 Pandemic.									

<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"/>	9	3922	A1	of the	18 PA C.S.	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description (include the name of statute or ordinance): THEFT BY DECEPTION									
Acts of the accused associated with this Offense: The Defendant did intentionally obtain or withheld property of another by deception. A person deceives if he intentionally creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind; but deception as to a person's intention to perform a promise shall not be inferred from the fact alone that he did not subsequently perform the promise. To wit: the Defendant falsely filed applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself and others, for his own benefit. Nelson Fornah used the personal information of individuals with intellectual disabilities in order to fraudulently obtain the benefits.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/26/21	OTN/LiveScan Number	Complaint/Incident Number FCE210001
Defendant Name:	First: NELSON	Middle:	Last: FORNAH

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"/>	10	3922	A1	of the	18 PA C.S.	1	F3		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Acts of the accused associated with this Offense: The Defendant, with the intent of committing theft by deception, took a substantia step to intentionally obtain or withheld property of another by deception. A person deceives if he intentionally creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind; but deception as to a person's intention to perform a promise shall not be inferred from the fact alone that he did not subsequently perform the promise. To wit: the Defendant filed fraudulent applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself and others, for his own benefit. Nelson Fornah used the personal information of individuals with the intent to defraud the Commonwealth of Pennsylvania, but no funds were disbursed.

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

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

Acts of the accused associated with this Offense:

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

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

Acts of the accused associated with this Offense:



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: NELSON	Middle:	Last: FORNAH

- 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 .
- 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.)

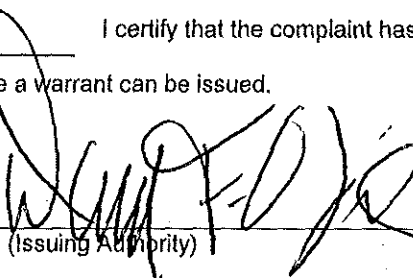

 (Signature of Affiant)

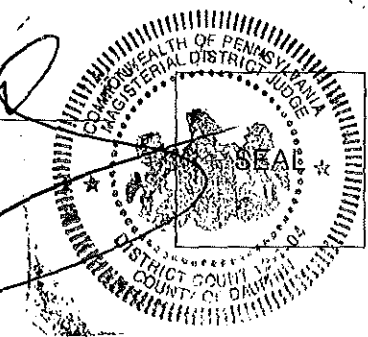
(Date) _____ (Year)

AND NOW, on this date Oct. 26 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.

12-1-04
 (Magisterial District Court Number)


 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 10/26/21	OTN/LiveScan Number	Complaint/Incident Number FCE210001
Defendant Name:	First: NELSON	Middle:	Last: FORNAH

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Clark Morris, Special Agent employed by the Pennsylvania Office of Attorney General (OAG), being duly sworn, deposes and says:

Your Affiant has been conducting an investigation into violations of the criminal laws of the Commonwealth of Pennsylvania. This investigation has utilized the resources of the Forty-Seventh Statewide Investigating Grand Jury. On October 7, 2021, The Forty-Seventh Statewide Investigating Grand Jury issued presentment Number 3 which was accepted by the Honorable Lillian Harris Ransom, Supervising Judge. The Presentment attached (ATTACHMENT A) to this Affidavit and incorporated herein by reference, recommends that the Attorney General or his designee file charges specified in the above Criminal Complaint and Presentment Number 3 against Nelson Fornah.

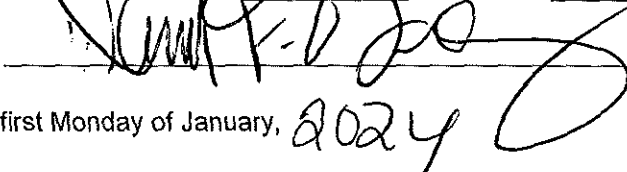
Based upon the facts contained in this Affidavit and its attachment, Your Affiant believes probable cause exists to show that Nelson Fornah committed the acts described herein, which constitute violations of the criminal laws of the Commonwealth of Pennsylvania.

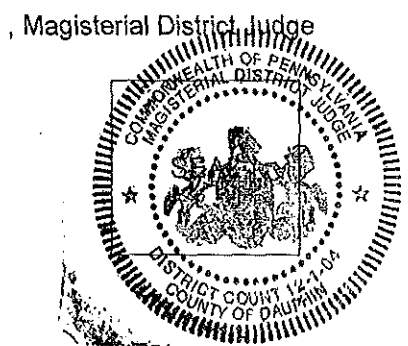
I, CLARK MORRIS, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.


 (Signature of Affiant)

Sworn to me and subscribed before me this 26 day of October 2021

10/26/21 Date 
 My commission expires first Monday of January, 2024



INTRODUCTION

We, the members of the Forty-Seventh Statewide Investigating Grand Jury, having received and reviewed evidence regarding violations of the Crimes Code occurring in Dauphin, Montgomery and Delaware Counties, Pennsylvania, pursuant to a Notice of Submission of Investigation No. 9, do hereby make the following findings of fact and recommendation of charges.

FINDINGS OF FACT

The Grand Jury conducted an investigation into allegations that Nelson Fornah ("Fornah"), a caregiver for intellectually disabled adults, stole identifying information from seven vulnerable individuals, ranging in age from 42 to 61, in order to fraudulently apply for government assistance. The Grand Jury determined that Fornah used stolen and false information to apply for and receive \$89,418.82 in pandemic unemployment assistance ("PUA") benefits, thereby stealing thousands of dollars of funds earmarked to assist those individuals who are truly in need. He also submitted fraudulent applications in his own name to obtain \$14,508.00 in regular unemployment compensation ("UC") benefits. In addition to swindling over \$100,000.00 from the state of Pennsylvania, Fornah used the same stolen information to steal in excess of \$12,000.00 in unemployment insurance ("UI") benefits from state of New ^{The} Jersey. ~~LA 888~~

In March 2020, the Coronavirus Aid, Relief, and Security Act was signed into law and made PUA benefits available to those who were eligible to receive them. The PUA program was intended as a means to provide financial assistance to those individuals who were unemployed due to the COVID-19 virus and who were not otherwise eligible for regular UC benefits. The PUA program is overseen by the United States Department of Labor and the Pennsylvania

Department of Labor & Industry ("L&I"), headquartered in Dauphin County, oversees and administers the program in Pennsylvania. Some of the individuals who are not eligible for PUA include retirees, inmates, individuals who are not working at all, and, those individuals receiving social security disability benefits with no work attachment. The Grand Jury heard testimony that it is illegal to accept compensation in exchange for filing a PUA application on behalf of someone else.

On July 23, 2020, Fornah applied for PUA benefits, claiming that he had been out of work since February 2020 due to a COVID-19 diagnosis. To the contrary, however, records revealed that Fornah remained fully employed by Keystone Human Services ("Keystone") - - both prior to and throughout the pandemic - - and collected regular paychecks. Accordingly, he was not eligible to receive PUA benefits. The Grand Jury learned that Fornah was employed as a direct support professional at Keystone. According to employment documents reviewed by the Grand Jury, Fornah was responsible for the instruction and support of individuals with disabilities so that they can have better opportunities for growth and meaningful life choices. Fornah was also tasked with acting as a role model for the people for whom he cared. Ideally, he was to be assisting these individuals in establishing meaningful relationships, helping them to trust and communicate with others, and, ensuring their happiness and safety.

Based upon the false employment information Fornah provided in his application, he began to receive PUA funds on July 30, 2020. The Grand Jury learned that PUA funds are placed into accounts maintained by U.S. Bank and that fund recipients receive U.S. Bank cards that operate as debit cards. One week later, Fornah began to use the U.S. Bank card he had been issued and withdrew cash from various ATM machines, most of which were located inside of Wawa convenience stores in Montgomery and Delaware Counties. The Grand Jury learned that,

while Fornah's application for PUA benefits was eventually denied by L&I, he later applied for and received regular UC benefits despite the fact that he was gainfully employed. Like his fraudulent application for PUA benefits, Fornah lied about his employment status in order to unlawfully receive the funds.

On August 5, 2020, Fornah applied for PUA benefits using the personal information for three residents for whom he was supposed to be providing care through his employment at Keystone: A.E., L.T., and I.F. These individuals, who reside in the same home in Norristown, Montgomery County, have varying levels of both intellectual and physical disabilities. These disabilities are severe enough that the individuals require assistance in performing most daily tasks and they are unable to safely navigate their surroundings absent around the clock professional care and assistance. The Grand Jury learned that all three applications were submitted electronically from the same IP address.¹ These applications and subsequent verifications contained the social security numbers and dates of birth for all three individuals. Fornah also provided copies of their social security cards, birth certificates and other personal documents in order to verify their identities. While the applications containing the personal information of A.E. and L.T. listed the address of the facility, the application in the name of I.F. contained the address of 244 Mill Street in Darby, Pennsylvania. The Grand Jury learned that this was Fornah's home address. In all three applications, it was requested that correspondence be provided via e-mail. The e-mail addresses supplied on the applications belonged to Fornah. While the e-mail addresses were later changed to appear as if they belonged to ^{L&I} the A.E., L.T. and I.F., records revealed that the new e-mail addresses were created on the same day that the

¹ An IP address is a unique numerical address that identifies a specific device connected to an internet network. The same IP address was also used to submit Fornah's own application for benefits.

applications were submitted to L&I from IP addresses known to be used by Fornah and listed Fornah's cellular telephone number as the account recovery contact.

On August 12, 2020, funds were deposited into the PUA accounts for A.B. and L.T. Within one week of the initial deposits, the bank records showed that the funds began to be withdrawn from ATM machines in Montgomery County. Again, the majority of the withdrawals occurred inside Wawa convenience stores.

On August 28, 2020, Fornah applied for a third round of PUA benefits. This time, he used his position as a caregiver to steal the personal identifying information of E.C., M.E. and R.P., all of whom reside together in a home located in Aston, Delaware County. For a second time, Fornah provided social security cards and birth certificates to apply for more free money. The Grand Jury heard testimony that while records revealed that Fornah created phony e-mail addresses for E.C., M.E. and R.P., the address and telephone number on the accounts belonged to Fornah. Similarly, the applications were submitted from the same IP address. Like Fornah's three previous victims of this scam, E.C., M.E. and R.P. also require extensive care and supervision in order for them to maintain safe and happy lives. All six individuals lack the ability to recognize dangerous situations, utilize or navigate e-mail communications, or, conduct internet searches.

On September 29, 2020, Fornah submitted an application for PUA benefits in Pennsylvania using the name and personal identifying information of another unsuspecting individual for whom he was to be providing care pursuant to his employment at Keystone: F.R.. Although this application was ultimately denied, it was prepared and sent from the same IP address that Fornah had previously used in his schemes.

On October 22, 2020, the accounts of R.P. and E.C. began to receive PUA funds. Within days, the accounts were depleted through multiple ATM withdrawals at various locations in Delaware County, as well as through purchases made at Home Depot, Walmart and Once Upon A Child.

In December 2020, L&I requested additional verification for the PUA accounts opened by Fornah. The Grand Jury learned that applicants are often asked to verify their identities and to re-certify the information provided in the online applications. Many state run programs, including the PUA program, utilized the services of ID.me, a third party vendor, in order to verify the identity of applicants. This program allows users to provide credentials digitally to complete the verification process. In order to do so, representatives of ID.me conduct video calls with users wherein they speak with them directly and take screen shots of the identification materials. In the recorded sessions involving the individuals victimized by Fornah, only the victims appeared on the screen. However, it was apparent that there was someone off camera speaking for the individuals and showing the required identification information in front of the camera. The Grand Jury was also able to observe that the victims appeared to be incoherent, unaware of their surroundings, or, at the very least, simply unable to understand what was happening. While not all of the ID.me recorded sessions reviewed by the Grand Jury had two-way sound, one particularly distressing video showed an upset and confused victim in a bathroom, shouting in the audio recording. In another video, the ID.me associate informed the person off screen that they could come into camera view. Although the response was not audible, the individual off camera declined the request. The victims in each video were clearly ~~unable~~ ^{LDA} unable to participate in any meaningful way, and in some cases, unable to meaningfully communicate at all.

While the accounts received consistent fund deposits through December 2020, no deposits were made in 2021 until May 5. At that time, the PUA funds deposited into the victims' accounts were substantial, totaling in excess of \$40,000.00. Fornah immediately began to withdraw cash from ATM machines in Delaware County. The cards issued in the names of A.E., M.E., E.C., L.T. and R.P. were all used at the same Wawa ATM to make withdrawals in \$500.00 increments. Later that day, the same U.S. Bank cards were used at ACME and Shoprite in Delaware County to purchase approximately ten \$500.00 money orders. In the following week, nearly all of the new funds were withdrawn through ATM withdrawals, money order purchases, and retail purchases. Many of the retail purchases occurred at BJ's Wholesale Club and were linked to a membership account belonging to Fornah. Additionally, an online purchase at Walmart was delivered to Fornah's home address.

The Grand Jury also discovered that, after the U.S. Bank cards were used to purchase the money orders, some of the money orders were deposited into Franklin Mint Federal Credit Union ("Franklin Mint FCU") and Wells Fargo accounts belonging to Fornah. For example, the Grand Jury reviewed surveillance footage from May 11, 2021 which captured Fornah using the U.S. Bank card issued in the name of A.E. to purchase a \$500.00 Western Union money order at a GIANT supermarket in Delaware County. That money order was then endorsed by Fornah and deposited into his Franklin Mint FCU bank account two days later. During the preceding week, \$8,000.00 in money orders purchased by Fornah at ACME and Shoprite were written out to Auto Exchange and endorsed with the name of Fornah. On May 12, 2021 more PUA assistance funds were received and the process began once again. In the following month, Fornah deposited or cashed nearly \$5,000.00 of Western Union money orders bearing his own name and signature at the Franklin Mint FCU.

The Grand Jury obtained extensive surveillance footage from Wawa locations throughout Montgomery and Delaware Counties for dates and times that coincided with U.S. Bank card activity. Based upon a review of both the video and bank records, an individual resembling Fornah can be seen on video making multiple ATM withdrawals within minutes of each other using different U.S. Bank cards in the name of the victims. Additionally, the Grand Jury obtained surveillance footage from ACME and Shoprite supermarkets for the dates and times when the U.S. Bank card was utilized. The videos clearly depicted Fornah as the individual making the purchases. None of the individuals for whom the cards were technically issued could be seen in the footage. The Grand Jury also noted that a review of the victims' cash boxes kept at their respective facilities, as well as the logs kept in connection therewith, did not show any deposits consistent with the sums that were being withdrawn from the U.S. Bank accounts.

Fornah's schemes were not limited to the theft of benefits in Pennsylvania. On September 20, 2020, Fornah used E.C.'s information to apply for UI benefits in New Jersey. The Grand Jury learned that New Jersey's program operates in a similar manner to Pennsylvania's program, requiring the applicant to have lost employment in order to receive monetary assistance. Rather than providing a debit card for an individual to access their benefits, however, the New Jersey program deposits the funds into existing accounts provided by the applicant. The account information supplied in connection with E.C.'s purported application was for Fornah's account with Wells Fargo. Records obtained by the Grand Jury revealed that the account not only received UI benefits totaling \$7,076.00, a \$5,000.00 stimulus payment intended for E.C. was deposited, as well.

On October 11, 2020, Fornah submitted additional UI applications for New Jersey benefits utilizing the identifying information for A.E., ^{L.M.B.} J.F. and R.P. The direct deposit account

information provided for A.E. and R.P. listed a Franklin Mint FCU account. The Grand Jury reviewed documents from Franklin Mint FCU showing that the account identified for the direct deposit belonged to Fornah. Two of the applications were submitted from the same IP address as those submitted for Fornah and others in Pennsylvania. Additionally, all of the accounts listed Fornah's telephone number. Fortunately, these three applications were denied and no additional funds were received from New Jersey. The Grand Jury learned that the addresses supplied on these applications belonged to facilities owned and ^{and} operated by Bancroft. Like Keystone, Bancroft is a New Jersey company that provides care for intellectually disabled individuals. Employment records revealed that Fornah worked at both Keystone and Bancroft.

While all of the applications, including Fornah's own applications, contained various untruths related to the inability to work or loss of employment due to COVID-19 as required for eligibility for benefits, the Grand Jury learned that A.E., L.T., I.F., E.C., M.E., R.P. and F.R. ^{L.M.B.A.} have never been employed and have required and received supervised care for their entire lives.

The chart below summarizes the fraudulent applications and the amount of money stolen by Fornah.

APPLICATION DATE	NAME	FUNDS RECEIVED
7/23/2020	Nelson Fornah	\$14,508.00 Unemployment \$1,936.00 PUA
8/5/2020	A.E.	\$18,457.63
8/5/2020	I.F.	\$390.00
8/5/2020	L.T.	\$20,274.11
8/28/2020	E.C.	\$15,762.11
8/28/2020	M.E.	\$16,263.89
8/28/2020	R.P.	\$16,335.08
9/20/2020	E.C.	\$7,076.00 NJ Unemployment \$5,000.00 NJ Stimulus
9/28/2020	F.R.	\$0 PUA
10/11/2020	A.E.	\$0 NJ
10/11/2020	I.F.	\$0 NJ
10/11/2020	R.P.	\$0 NJ