

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



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA
 VS.

DEFENDANT: (NAME and ADDRESS):
AARON **ANDERSON-BUSH** Gen
 First Name Middle Name Last Name
 2054 E Willard St
 Philadelphia, Pennsylvania 19134

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-148-22	Date Filed 6/15/22	OTN/LiveScan Number R. 306395-5	Complaint/Incident Number FCE210014	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 02/23/1991	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name AKA		Middle Name	Last Name	Gen.
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 checked="" 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"/> ONG (Orange)	<input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green) <input 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 type="checkbox"/> MAR (Maroon)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <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.) 150
FBI Number	MNU Number			Ft. HEIGHT In. 5 9
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).

DAG SUZANNE EDWARDS APPROVED VIA PHONE **06/15/2022**
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, **CAM LONG** **842**
 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of **Pennsylvania Office of Attorney General** **PA0222400**
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

In **DAUPHIN** County **[22]** on or about **JUNE 7, 2020 TO SEPTEMBER 9, 2021**
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-148-22	Date Filed: 6/29/22	OTN/LiveScan Number R 306945-5	Complaint/Incident Number FCE210014
Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

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	3922	A2	of the	18 PA C.S.A	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): **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: Aaron Anderson-Bush intentionally filed fraudulent applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself 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 \$52,872.

<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	4911	A1	of the	18 PA C.S.A	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): **TAMPERING WITH PUBLIC RECORDS**

Acts of the accused associated with this Offense: In that 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: Aaron Anderson-Bush knowingly used false or fraudulent information in order to file applications for Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website

<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	3925	A	of the	18 PA C.S.A	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant intentionally received, retained, or disposed of movable property of another knowing that it had been stolen, or believing that it had probably been stolen. TO WIT: Aaron Anderson-Bush did unlawfully receive Pandemic Unemployment Assistance benefits totaling approximately \$52,872 from the PA Department of Labor and Industry knowing that he was not entitled to receive said benefits.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-140-22</i>	Date Filed: <i>06/15/22</i>	OTN/LiveScan Number <i>R 306395-5</i>	Complaint/Incident Number FCE210014
Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

- 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.)

SA CAM LONG

06/15/2022

(Date)



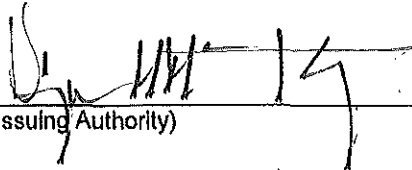
(Signature of Affiant)

AND NOW, on this date JUNE 15, 2022 I certify that the complaint has been properly completed and verified.

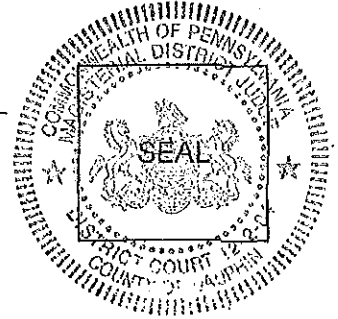
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-04

(Magisterial District Court Number)



(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-148-22</i>	Date Filed: <i>6/18/22</i>	OTN/LiveScan Number <i>R 306395-5</i>	Complaint/Incident Number FCE210014
Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

AFFIDAVIT of PROBABLE CAUSE

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

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Cam Long, 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 was employed by the Virginia State Police from 2018-2021 and received extensive training at their academy in Richmond, Virginia and elsewhere. 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-6401. Your Affiant has been so employed since August 2021 and is currently assigned to the Financial Crime Section in Norristown, Pennsylvania.

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.

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



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

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 (US-DOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry (PA-DOL) 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 the PA-DOL'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, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution." On June 1, 2020, the Pennsylvania Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA-related fraud based upon the findings of an audit conducted by the PA-DOL.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-148-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R-306395-5</i>	Complaint/Incident Number FCE210014
Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

III. INVESTIGATION

On October of 2021, the Philadelphia Office of Inspector General referred this PUA investigation to the Office of Attorney General (OAG) based upon records that Aaron Anderson-Bush was employed by the City of Philadelphia and receiving PUA benefits concurrently.

Anderson-Bush began his employment with the City of Philadelphia in June of 2007 and remained continuously employed with the City at least through July of 2021. Payroll records indicate that Anderson-Bush did not see a reduction in employment hours and received full payroll checks between June 20, 2020 and June 16, 2021. The PUA program expired in Pennsylvania on September 4, 2021.

On June 17, 2020, Anderson-Bush completed a PUA application on the PA-DOL website. Anderson-Bush's application listed his address as 2054 E. Willard St., Philadelphia, PA 19134, which is the same address listed in his City of Philadelphia employment records. His application also listed telephone number (267) 602-3120. The application indicated that his last day of work with the City of Philadelphia was on March 30, 2020, and that he was currently unemployed. PUA applications required each applicant to certify that the information submitted to PA-DOL was true and correct. Prior to submission, Anderson-Bush completed this certification.

Your Affiant received documentation from PA-DOL that included the PUA application for Anderson-Bush and a chronology of payments. Payments were issued to Anderson from the date of his application (6/17/20) through June of 2021. For the purpose of payment, a US Bank Reliacard ending in 0516 was issued to Anderson-Bush for direct deposit of funds. This card was mailed to Anderson-Bush's address, 2054 E. Willard St., Philadelphia, PA 19134. According to US Bank records obtained via Search Warrant, Anderson-Bush activated US Bank debit Card 4912 8810 1908 0516 on June 17, 2020 at 8:54 am. PUA funds were then issued to Anderson-Bush's US Bank Reliacard on a weekly basis pending his responses on the PA-DOL website. Anderson-Bush re-certified his unemployment status in order to continue receiving the PUA funds. Specifically, as part of the



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-148-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306 395-5</i>	Complaint/Incident Number FCE210014
Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

recertification of unemployment process, Anderson-Bush answered “yes” to the question “Claimant, were you still unemployed, as a direct result of this disaster/pandemic?” for each weekly recertification. The records provided by PA-DOL and US Bank indicate that Anderson-Bush was paid \$52,872 in PUA benefits.

According US Bank records obtained via Search Warrant, Anderson-Bush accrued 25 Automated Clearing House (ACH) transactions totaling \$22,068.57 into his suspected personal bank account with bank number XXXXXX1160 and routing number XXXXX4298. These transactions took place between September 24, 2020, and June 19, 2021. According to Philadelphia Federal Credit Union (PFCU) documents obtained via Search Warrant, it was further determined that account XXXXXX1160 was registered to Aaron Anderson-Bush. PFCU documents also listed Anderson-Bush’s address as 2054 E. Willard St., Philadelphia, PA 19134. Additionally, all 25 ACH transactions between the US Bank account and PFCU were displayed on the bank statements obtained via Search Warrant.

According to PA-DOL records, Anderson-Bush’s reported wages with the City of Philadelphia were the following:

- 1Q 2020: \$8,833.21
- 2Q 2020: \$12,068.01
- 3Q 2020: \$10,572.86
- 4Q 2020: \$10,166.26
- 1Q 2021: \$8,394.47
- 2Q 2021: \$13,815.47
- 3Q 2021: \$12,202.28
- 4Q 2021: \$16,501.42

Throughout this entire time period, Anderson-Bush was continuously employed with the City of Philadelphia and did not see a reduction of hours. Anderson-Bush’s gainful employment during this time period makes him ineligible to receive PUA benefits.

IV. CONCLUSION



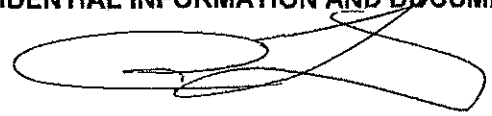
POLICE CRIMINAL COMPLAINT

Docket Number: <i>CL-148-22</i>	Date Filed: <i>6/15/22</i>	OTN/LiveScan Number <i>R 306395-5</i>	Complaint/Incident Number FCE210014
Defendant Name:	First: AARON	Middle:	Last: ANDERSON-BUSH

Based on the facts and circumstances of this investigation, and your Affiant's training and experience, your Affiant believes that Anderson-Bush fraudulently obtained PUA benefits. This investigation, which included records provided by the PA-DOL and City of Philadelphia, revealed that Anderson-Bush filed a PUA application which resulted in him obtaining \$52,872 in benefits for which he was not eligible. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires the applicant to acknowledge that any false statements made on the application is a criminal offense. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for Aaron Anderson-Bush.

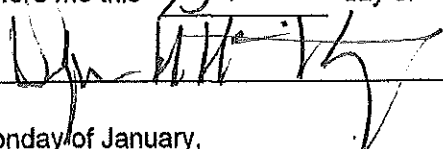
I, CAM LONG, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.



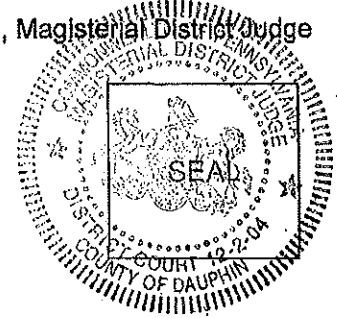
(Signature of Affiant)

Sworn to me and subscribed before me this 15th day of June 2022

6/15/22 Date 

My commission expires first Monday of January,

Magisterial District Judge





VS.

Magisterial District Number: 12-2-04
MDJ: Hon. MDJ Sonya McKnight
Address: 1805 North Cameron St
Harrisburg, PA 17103

DEFENDANT:

(NAME and ADDRESS):

AMIR

BERRY

First Name

Middle Name

Last Name

Gen

1539 S 58th St
Philadelphia, Pennsylvania 19143

Telephone: (717) 233-3599

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	
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<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 <i>CR-149-22</i>	Date Filed <i>6/15/22</i>	OTN/LiveScan Number <i>R 306397-0</i>	Complaint/Incident Number FCE210013	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 09/07/1992	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
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 checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	HAIR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)	Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)	DNA <input type="checkbox"/> YES <input type="checkbox"/> NO
FBI Number	DNA Location	MNU Number	WEIGHT (lbs.) 200	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	Fingerprint Classification:		Ft. HEIGHT In. 6 2	

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).

DAG SUZANNE EDWARDS

Approved via Phone

06/15/2022

15

(Signature of the attorney for the Commonwealth)

(Date)

I, CAM LONG

842

(Name of the Affiant)

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

of Pennsylvania Office of Attorney General

PA0222400

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

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

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [301] Harrisburg City
(Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County

[22]

(County Code)

on or about JUNE 7, 2020 TO SEPTEMBER 9, 2021

POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-149-22</i>	Date Filed: <i>6/19/22</i>	OTN/LiveScan Number <i>R 306397-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

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"/> Lead?	1	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): **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: Amir Berry intentionally filed fraudulent applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself 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 \$63,356.00.

<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?	2	4911	A1	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
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

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 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: Amir Berry knowingly used false or fraudulent information in order to file applications for Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website.

<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?	3	3925	A	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
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. TO WIT: Amir Berry did unlawfully receive Pandemic Unemployment Assistance benefits totalling approximately \$63,356.00 from the PA Department of Labor and Industry knowing that he was not entitled to receive said benefits.

POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-149-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R306397-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

- 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.)

SA CAM LONG

06/15/2022

(Date)

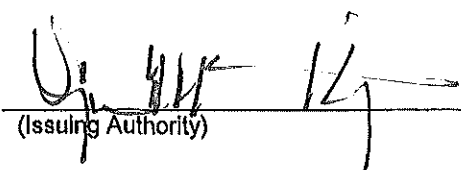


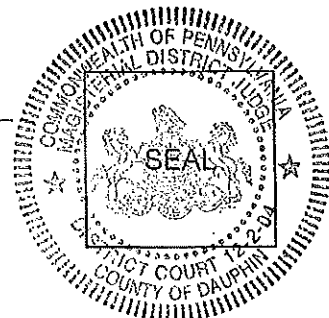
(Signature of Affiant)

AND NOW, on this date June 15, 2022 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.

12-2-04
(Magisterial District Court Number)


(Issuing Authority)



Docket Number: <i>CR-149-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306398-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

AFFIDAVIT of PROBABLE CAUSE

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

I. AFFIANT'S BACKGROUND

Your Affiant, Agent Cam Long, 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 was employed by the Virginia State Police from 2018-2021 and received extensive training at their academy in Richmond, Virginia and elsewhere. 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-6401. Your Affiant has been so employed since August 2021 and is currently assigned to the Financial Crime Section in Norristown, Pennsylvania.

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.

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



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-149-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306397-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

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 (US-DOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry (PA-DOL) administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the PA-DOL'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, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution." On June 1, 2020, the Pennsylvania Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA-related fraud based upon the findings of an audit conducted by the PA-DOL.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-149-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R306397-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

III. INVESTIGATION

On October 18, 2021, the Philadelphia Office of Inspector General referred this PUA investigation to the Office of Attorney General (OAG) based upon records that Amir Berry was employed by the City of Philadelphia and receiving PUA benefits concurrently.

Berry began his employment with the City of Philadelphia in September of 2014 and remained continuously employed with the City at least through December of 2021. Payroll records indicate that Berry did not see a reduction in employment hours and received full payroll checks between January 5, 2020, and September 26, 2021. The PUA program expired in Pennsylvania on September 4, 2021.

On June 8, 2020, Berry completed a PUA application on the PA-DOL website. Berry's application listed his address as 1539 S. 58th St., Philadelphia, Pennsylvania 19413, which is the same address listed in his City of Philadelphia employment records. His application also listed telephone number (267) 346-5677. The application indicated that his last day of work with the City of Philadelphia was on April 13, 2020, and that he was currently unemployed. PUA applications required each applicant to certify that the information submitted to PA-DOL was true and correct. Prior to submission, Berry completed this certification.

On June 9, 2020, PA-DOL issued Berry two checks: Check#1101251670 in the amount of \$4,576.00, and Check #1101288855 in the amount of \$4,800.00, drawn on Commonwealth of Pennsylvania Wells Fargo Bank account ending in 4557. According to American Heritage Financial Credit Union (AHFCU) records obtained via Search Warrant, both checks totaling \$9,376.00 were deposited into Berry's bank account on June 15, 2020. Bank records indicate that account number XXXXX0854 is registered to Amir Berry with the address 1539 S. 58th St., Philadelphia, Pennsylvania 19143.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-144-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306 397-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

Additional PUA benefits were issued to Berry on two, US Bank Prepaid Debit Cards ending in 4187 and 0668, which were both mailed to his address, 1539 S. 58th St., Philadelphia, Pennsylvania 19413. According to US Bank records obtained via Search Warrant, Berry activated US Bank debit Card 4912 8810 2274 0668 on June 13, 2020 at 10:23 am. Berry reported US Bank card ending in 0668 as "lost" in March of 2021 and US Bank issued him a new debit card, 4912 8810 4456 4187, which he activated on April 6, 2021 at 3:58 pm. PUA funds were issued to Berry's US Bank Reliacards on a weekly basis pending his responses on the PA-DOL website. Berry recertified his unemployment status in order to continue receiving the PUA funds. Specifically, as part of the recertification of unemployment process, Berry answered "yes" to the question "Claimant, were you still unemployed, as a direct result of this disaster/pandemic?" for each weekly recertification. The records provided by PA-DOL and US Bank indicate that Berry received a total of \$63,356.00 in PUA benefits.

According to PA-DOL records, Berry's reported wages with the City of Philadelphia were the following:

- 1Q 2020: \$9,844.67
- 2Q 2020: \$13,256.22
- 3Q 2020: \$11,478.68
- 4Q 2020: \$12,486.86
- 1Q 2021: \$10,765.27
- 2Q 2021: \$15,201.71
- 3Q 2021: \$6,512.05
- 4Q 2021: \$9,047.94

Throughout this entire time period, Berry was continuously employed with the City of Philadelphia and did not see a reduction of hours. Berry's gainful employment during this time period makes him ineligible to receive PUA benefits.

IV. CONCLUSION

Based on the facts and circumstances of this investigation, and your Affiant's training and experience, your Affiant believes that Amir Berry fraudulently obtained PUA benefits. This investigation, which included records




POLICE CRIMINAL COMPLAINT

Docket Number: <i>CP-149-22</i>	Date Filed: <i>6/12/22</i>	OTN/LiveScan Number <i>R 306397-0</i>	Complaint/Incident Number FCE210013
Defendant Name:	First: AMIR	Middle:	Last: BERRY

provided by the PA-DOL and City of Philadelphia, revealed that Berry filed a PUA application which resulted in him obtaining \$63,356.00 in benefits for which he was not eligible. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires the applicant to acknowledge that any false statements made on the application is a criminal offense. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for Amir Berry.

I, CAM LONG, 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.



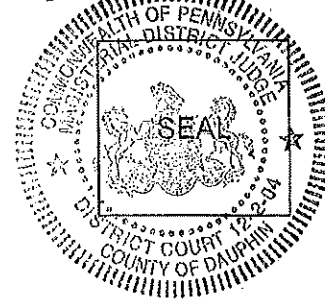
(Signature of Affiant)

Sworn to me and subscribed before me this 15th day of June 2022

6/15/22 Date *[Signature]*

Magisterial District Judge

My commission expires first Monday of January, 2028



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number:
MDJ: Hon. MDJ Sonya McKnight
Address: 1805 North Cameron St
Harrisburg, PA 17103

DEFENDANT: (NAME and ADDRESS):

ANTONIO VINCENT FORD
First Name Middle Name Last Name

136 W Wyneva St
Philadelphia, PA 19144

Telephone: (717)233-3599

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 <i>CR-151-2022</i>	Date Filed <i>06/15/2022</i>	OTN/LiveScan Number <i>R 306 4073</i>	Complaint/Incident Number FCE-21-0019	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
-------------------------------------	---------------------------------	--	--	--

GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB <i>05/25/1990</i>	POB	Add'l DOB / /	Co-Defendant(s) <input 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 checked="" type="checkbox"/> BLK (Black) <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)
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
FBI Number	MNU Number	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT In.
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).

DAG SUZANNE EDWARDS
(Name of the attorney for the Commonwealth)

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

06/15/2022
(Date)

I, KATHRYN GRADY
(Name of the Affiant)

797

(PSP/MPPOETC -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

June 7, 2020 - Sept. 9, 2021



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-151-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R306407-3</i>	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

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"/>	1	3922	A2	of the	18 PA C.S.A.	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): **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: Antonio Ford intentionally filed fraudulent applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself 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 \$59,422.

<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	3925	A	of the	18 PA C.S.A.	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant, is guilty of theft if he intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. TO WIT: Antonio Ford filed for Pandemic Unemployment Assistance benefits for himself and received the funds from the benefit program while fully employed with the City of Philadelphia, knowing he did not qualify for such benefits.

<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"/>	3	4911	A1	of the	18 PA C.S.A.	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**

Acts of the accused associated with this Offense: In that 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: Antonio Ford knowingly used false or fraudulent information in order to file applications for Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-151-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306407-3</i>	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

- 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 10.
- 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.)

 (Date) (Year)

[Handwritten Signature]

 (Signature of Affiant)

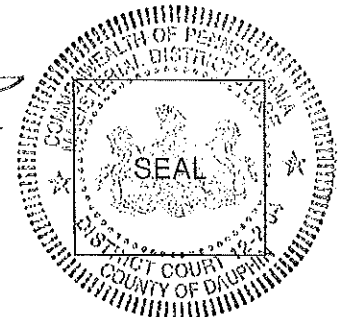
AND NOW, on this date JUNE 15, 2022 I certify that the complaint has been properly completed and verified.
 An affidavit of probable cause must be completed before a warrant can be issued.

12-2-04

 (Magisterial District Court Number)

[Handwritten Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CE-151-22	Date Filed: 6/19/22	OTN/LiveScan Number R 306407-3	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

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. AFFIANTS' 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 COMPLAIN

Docket Number: <i>CL-151-22</i>	Date Filed: <i>6/19/22</i>	OTN/LiveScan Number <i>R 306407-3</i>	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

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 (US-DOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry (PA-DOL) administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the PA-DOL'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, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution." On June 1, 2020, the Pennsylvania Office of Attorney General



POLICE CRIMINAL COMPLAIN

Docket Number: CR-151-22	Date Filed: 6/19/22	OTN/LiveScan Number R 306407-3	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

received a referral letter from the Governor’s office referring investigation and prosecution of PUA-related fraud based upon the findings of an audit conducted by the PA-DOL. The PUA program expired in Pennsylvania on September 4, 2021.

III. INVESTIGATION

On October 18, 2021, the Philadelphia Office of Inspector General referred this investigation to the Office of Attorney General (OAG) based upon records that City of Philadelphia employees were receiving PUA benefits while still actively employed with the City. Antonio Ford was one of the City of Philadelphia employees referred to this agency for investigation.

Ford began his employment with the City on July 6, 2013. He was placed on “unpaid leave” from December 3, 2020, until Mar 21, 2021, and received his last paycheck on December 11, 2020. Payroll records reflect that Ford did not see a reduction in employment hours and received full payroll checks between January 5, 2020 and December 11, 2020. According to Ford’s Supervisor, Wayne Tynes, the last time Ford was physically present at work was on November 25, 2020, and he was unsure why Ford stopped working. Although the City of Philadelphia never officially terminated Ford, there is no indication that he stopped reporting to work due to COVID-19 reasons, or that his employer reduced his hours. Ford was thus ineligible to receive benefits from the PUA program.

On June 10, 2020, Ford completed a PUA application on the PA-DOL website. Ford listed his address as 136 W. Wyneva St., Philadelphia, PA 19144, and his telephone number as (215) 410-8734. The application indicated his last day of work with the City of Philadelphia was on April 10, 2020, and that he was currently unemployed. The address listed on Ford’s PUA application matches his Pennsylvania Driver’s License, which expires on May 25, 2023. Ford’s application also indicated that he was not receiving sick leave pay or other paid leave benefits equaling normal pay. However, payroll records indicate that Ford was in fact receiving full



POLICE CRIMINAL COMPLAIN

Docket Number: CR-151-22	Date Filed: 6/13/22	OTN/LiveScan Number R 306407-3	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

paychecks while also receiving PUA benefits. Some of these pay periods included overtime pay. PUA applications required each applicant to certify that the information submitted to PA-DOL was true and correct. Prior to submission, Ford completed this certification.

On June 11, 2020, PA-DOL issued Ford two checks: Check#1101362138 in the amount of \$5,400 and Check # 1101352131 in the amount of \$4,527, drawn on Commonwealth of Pennsylvania Wells Fargo Bank account ending in 4557. Your Affiant obtained records from Wells Fargo Bank via Search Warrant and determined that these checks were negotiated at American Heritage Federal Credit Union (AHFCU). A follow-up Search Warrant revealed that these checks were deposited at the AHFCU ATM located at 2800 Fox Street, Philadelphia, PA 19129, on June 16, 2020. Per AHFCU, the deposit credited an account at Police and Fire Federal Credit Union (PFFCU). PFFCU records were then obtained via Search Warrant, which revealed that these checks were deposited into Antonio Ford's account. The signature card on the account lists Ford's address as 136 W. Wyneva St, Philadelphia, PA 19144. A review of Ford's bank statements confirmed the deposit of both PUA benefit checks as well as direct deposits from the City of Philadelphia payroll.

Additional PUA benefits were issued to Ford on two, US Bank Prepaid Debit Cards, which were both mailed to his address, 136 W. Wyneva St, Philadelphia, PA 19144. According to US Bank records obtained via Search Warrant, Ford was first issued US Bank Debit Card 4912 8810 2467 9674, which was later replaced by US Bank Debit Card 4912 8810 4501 2335. PUA funds were issued to Ford's US Bank Debit Cards on a weekly basis pending his responses on the PA-DOL website. In order to continue receiving PUA benefits, the applicant was required to file weekly certifications. As part of the weekly recertification process, the applicant must indicate if they earned any wages. If wages were reported, it would affect the amount of benefits the applicant received or render the applicant ineligible for benefits.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-151-22</i>	Date Filed: <i>6/19/22</i>	OTN/LiveScan Number <i>R306407-3</i>	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

The records provided by PA-DOL and US Bank, Ford received a total of \$59,422 in PUA benefits. Ford's employment records indicate that he was ineligible to receive PUA benefits.

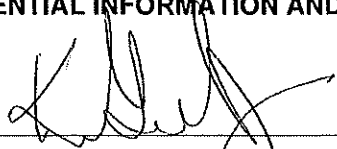
IV. CONCLUSION

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 Antonio Ford fraudulently obtained Pandemic Unemployment Assistance benefits. This investigation, which included records provided by the Pennsylvania Department of Labor and Industry, Pennsylvania Treasury, Wells Fargo, and US Bank, revealed that Ford filed a PUA application and received \$59,422 in benefits for which he was not eligible. The PUA applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires the applicant to acknowledge that any false statements made on the application is a criminal offense.

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 her knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant Antonio Ford.

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.



(Signature of Affiant)

Sworn to me and subscribed before me this 15th day of JUNE 2022

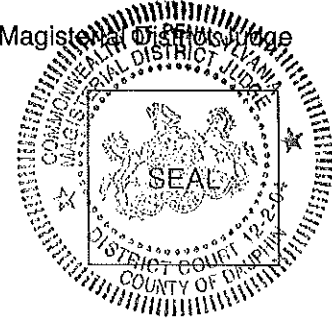


POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-151-22</i>	Date Filed: <i>6/15/22</i>	OTN/LiveScan Number <i>R 306407-3</i>	Complaint/Incident Number FCE-21-0019
Defendant Name:	First: ANTONIO	Middle: VINCENT	Last: FORD

6/15/22 Date *[Signature]*, Magistrate District Judge

My commission expires first Monday of January,



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number: 12-2-04
MDJ: Hon. Sonya McKnight
Address: 1805 North Cameron St., Harrisburg,
PA 17103

Telephone: (717)233-3599



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
CHRISTOPHER L DAYE
First Name Middle Name Last Name Gen

5151 HOOPES ST., PHILADELPHIA, PA 19139

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 <i>CR-145-22</i>	Date Filed <i>06/09/22</i>	OTN/LiveScan Number <i>R 3062684</i>	Complaint Number BCE-210269	Incident Number BCE210269	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 4/06/1978	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
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 checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input checked="" 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 type="checkbox"/> BRO (Brown)
<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input checked="" type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<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)
<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number 123305DB5	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO					Ft. HEIGHT In.
Fingerprint Classification:					6 1

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MMYY) /	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).

DAG KATHERINE MCDERMOTT
(Name of the attorney for the Commonwealth)

approved electronically 6/9/2022
(Signature of the attorney for the Commonwealth)

/ /
(Date)

I, SA TARYN LIEBTAG
(Name of the Affiant)

BADGE #812
(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] PA Dept Of Labor And Industry, 651
Boas St., Harrisburg, PA 17121 (Subdivision Code) (Place/Political Subdivision)

in DAUPHIN County [22]
(County Code)

on or about JUNE 2020 TO SEPTEMBER 2021



POLICE CRIMINAL COMPLAINT

Docket Number: CR-145-22	Date Filed: 06/19/22	OTN/LiveScan Number R 30626B-4	Complaint/Incident Number BCE-210269
Defendant Name:	First: CHRISTOPHER	Middle: L	Last: DAYE

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.)

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 checked="" type="checkbox"/>	1	3922	A3	of the TITLE 18	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 intentionally obtained the property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced. Christopher Daye applied for and received \$42,860.00 of Pennsylvania Department of Labor and Industry Pandemic Unemployment Assistance (PUA) Funds by creating and repeatedly reinforcing the false impression that he was no longer employed by the City of Philadelphia Streets Department and eligible for unemployment.

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"/>	2	3925	A	of the TITLE 18	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The defendant intentionally received and retained \$42,860.00 in movable property belonging to the Pennsylvania Department of Labor and Industry, knowing that it had been stolen.

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"/>	3	4911	A1	of the TITLE 18	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**

Acts of the accused associated with this Offense: A person commits the offense if he knowingly makes 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. Defendant Christopher Daye made false entries in the Pandemic Unemployment Applications he submitted.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-145-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306 268-4</i>	Complaint/Incident Number BCE-210269
Defendant Name:	First: CHRISTOPHER	Middle: L	Last: DAYE

- 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.) _____

SA TARYN LIEBTAG

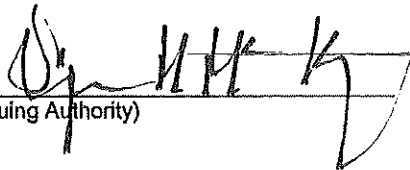
6/10/2022
(Date)

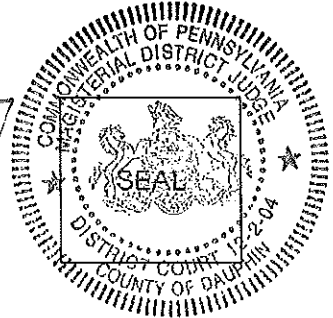

(Signature of Affiant)

AND NOW, on this date JUNE 15, 2022 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.

12-2-04
(Magisterial District Court Number)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-145-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R306268-4</i>	Complaint/Incident Number BCE-210269
Defendant Name:	First: CHRISTOPHER	Middle: L	Last: DAYE

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Taryn Liebtog, #812, of the Pennsylvania Office of Attorney General (OAG) being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant has been assigned to the Eastern Regional Office, Bureau of Criminal Investigation Section of the Office of Attorney General since July 2020. As a Special Agent, your Affiant's primary duties are to investigate crimes, interview and interrogate suspects and witnesses, prepare and execute search warrants, file criminal complaints and make arrests of criminal activity reported to the Office of Attorney General. Prior to becoming a Special Agent, your Affiant was a Consumer Protection Agent with the Office of Attorney General for 5 years, and in June 2018, became a Certified Fraud Examiner (CFE), which combines knowledge of complex financial transactions with an understanding of investigative techniques and legal issues. 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 white collar crimes, theft, and fraud.

II. BACKGROUND OF INVESTIGATION

On 3/27/2020, 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 provided up to seventy-nine (79) weeks of unemployment benefits and provided funding to the states for administration of the program. The PUA program provided unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA was only available to individuals who were unemployed due to COVID-19 reasons and did not cover individuals without an attachment to the labor market or those who were unemployed for non-COVID-19 reasons. This benefit was only for individuals who would otherwise be working but were unable to because of the pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups were 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, the Pennsylvania Department of Labor & Industry's website stated 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."



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-145-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R 306 268-4</i>	Complaint/Incident Number BCE-210269
Defendant Name:	First: CHRISTOPHER	Middle: L	Last: DAYE

III. FRAUDULENT CLAIM

The Pennsylvania Department of Labor and Industry (Labor and Industry) reported that on 6/08/2020, Christopher L. Daye, DOB 4/06/1978, SSN 1 (as referenced on Confidential Information Form) applied for PUA benefits. Applicants could receive benefits for lost wages predating their application, and Daye applied for and was awarded benefits for weeks ending on 3/21/2020 through 8/28/2021. Applicants were required to complete weekly certifications of their employment status in order to continue to receive benefits, and Labor and Industry records show that certifications were submitted for each week Daye received benefits.

Labor and Industry also provided application and payment information regarding Christopher L. Daye's claims, which show that Daye's PUA application submitted on 6/08/2020 was filed using DOB 4/06/1978, SSN 1, email address Christopher.daye@yahoo.com, and phone number 267-904-9687. On the application it was reported that Daye was unemployed as a direct result of a pandemic or major disaster and that the major disaster was "COVID-19". The date provided for Daye's last day of employment was 3/16/2020. On 02/03/2021, another application was filed to reopen the claim (providing the same identifying and contact information). This application again reported that Daye was unemployed as a direct result of a pandemic or major disaster and that the major disaster was "COVID-19". This application, however, provided 3/01/2020 as Daye's last day of employment.

Information provided by Labor and Industry shows that PUA payments were made to various US Bank debit cards associated with US Bank account / customer ID XXXXX0572 held by Christopher L. Daye (DOB 4/06/1978, SSN 1, email address Christopher.daye@yahoo.com, and phone number 267-904-9687).

According to the PA Department of Labor and Industry employment database, the City of Philadelphia reported wages for Christopher Daye (SSN 1) for all quarters of 2020 and 2021. The Office of the Inspector General for the City of Philadelphia confirmed that Daye was employed full time as an Asphalt Raker for the City of Philadelphia, Streets Department during the period for which he received benefits, and that no wages were lost due to the COVID-19 pandemic.

IV. US BANK SEARCH WARRANT

Based on the above information, your affiant obtained a search warrant for US Bank account records associated with Christopher Daye. US Bank provided card holder information, card information, and transaction history in reference to Customer ID XXXXX0572, associated with Christopher Daye, DOB 4/06/1978 with an address of 5151 Hoopes St., Philadelphia, PA 19139.

From 6/10/2020 to 9/01/2021, seventy-eight (78) payments totaling \$42,860.00 were deposited onto the account's debit cards by the Commonwealth of PA for "UCBENEFITS", listing the payee as Christopher Daye. On 7/08/2020, \$5,000.00 was transferred from Daye's US Bank debit card XXXXX6848 to Citizens Bank account FAN1 (as referenced on Confidential Information Form) via ACH withdrawal. On 7/09/2020, an additional \$3,969.06 was transferred to



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-145-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R 306268-4</i>	Complaint/Incident Number BCE-210269
Defendant Name:	First: CHRISTOPHER	Middle: L	Last: DAYE

Citizens Bank XXXXXX3272 in the same manner. Account records for each withdrawal reference "Christopher Daye" and "Personal Checking".

V. CITIZENS BANK SEARCH WARRANT

Based on the above information, your affiant obtained a search warrant for Citizens Bank account records associated with Christopher Daye. Citizens Bank provided account holder information, statements, deposits and withdrawals in reference to FAN1, associated with Christopher L. Daye with an address of 5151 Hoopes St., Philadelphia, PA 19139. A review of Daye's Citizens Bank statements confirmed transactions which correspond with the US Bank transfers - deposits of \$5,000.00 on 7/09/2020 and \$3,969.06 on 7/10/2020. During the time that Daye was receiving PUA benefits, numerous biweekly deposits appear on the statements identified as "City of Phila Payroll" followed by Daye's payroll number.

VI. COMMUNICATION WITH DAYE

During the course of the investigation, the assigned spoke with Christopher Daye by phone and later in person. When asked about his PUA benefits, Daye said that he was not working at the time. He had been out of work for about a year, and the City was not paying him workman's comp - they had cut him off. He stated that he was hit by a truck on the job then had a heart attack when he came back to work. He had been off of work for about a year when he applied for benefits, adding that there was a lot of confusion about PUA eligibility and that he had someone else apply for him as he is not computer literate. Daye said that the city was making him use his own time and he was not getting paid.

VII. CITY OF PHILADELPHIA EMPLOYMENT RECORDS

On 1/25/2022, the Office of the Inspector General for the City of Philadelphia provided employment records which showed that Christopher Daye (SSN 1) was employed by the City of Philadelphia during the entire time he was collecting PUA benefits. At the beginning of the COVID-19 pandemic, Daye was granted an unpaid leave of absence per the Family and Medical Leave Act, which he took from 3/16/2020 - 4/08/2020. Daye was put on paid COVID excused time starting on 4/09/2020, and returned to work on 4/17/2020. From then until 8/28/2021, he received biweekly paychecks and 3 salary increases from the City of Philadelphia, all while collecting PUA benefits.

VIII. CONCLUSION

Per the CARES Act, PUA was only available to individuals who were unemployed due to COVID-19 reasons. While Daye was employed by the City of Philadelphia, he applied for PUA benefits on 6/08/2020 and again on 2/03/2021. During that time, he received \$42,860 in benefits and submitted certifications for each of the weeks he received benefits confirming he was unemployed.

Affiant requests an arrest warrant charging Christopher L. Daye with 18 Pa.C.S.A. § 3922(a)(3) Theft By Deception, § 3925(a) Receiving Stolen Property, and § 4911(a)(1) Tampering with Public Records.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-145-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R 306268-4</i>	Complaint/Incident Number BCE-210269
Defendant Name:	First: CHRISTOPHER	Middle: L	Last: DAYE

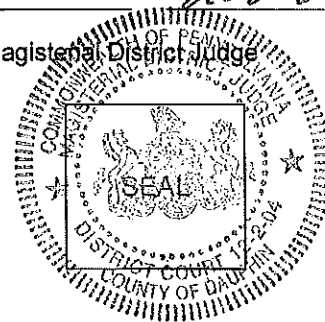
I, SA TARYN LIEBTAG, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.

6/10/22 *Taryn Liebtag* #812
(Signature of Affiant)

Sworn to me and subscribed before me this *15th* day of *June* *2022*
6/15/2022 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January, *2028*



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



POLICE CRIMINAL COMPLAINT
 COMMONWEALTH OF PENNSYLVANIA

VS.
 DEFENDANT: (NAME and ADDRESS):
DERRICK M **SMITH** Gen
 First Name Middle Name Last Name
 435 E. Penn St,
 Philadelphia, PA 19144

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 <i>CR-152-22</i>	Date Filed <i>6/19/22</i>	OTN/LiveScan Number <i>R 306413-2</i>	Complaint/Incident Number <i>BCE-210272</i>	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input type="checkbox"/> Female	DOB <i>05/23/1982</i>	POB <i>Pennsylvania</i>	Add'l DOB <i>/ /</i>	Co-Defendant(s) <input type="checkbox"/>
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	First Name <i>AKA</i>			
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	Middle Name			
Hair Color <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White) <input type="checkbox"/> BLN (Blonde / Strawberry)	Last Name			
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon)	Gen.			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) <i>200</i>
FBI Number <i>511249XB9</i>	MNU Number			Ft. HEIGHT In. <i>5 4</i>
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).

DAG KATHERINE MCDERMOTT
 (Name of the attorney for the Commonwealth)
Approved electronically 6/10/22 *6-11/22*
 (Signature of the attorney for the Commonwealth) (Date)

I, **SA MARK BATES** # **790**
 (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of **Pennsylvania Office of Attorney General** **PA0222400**
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe
 with violating the penal laws of the Commonwealth of Pennsylvania at [301] Pa Dept Of Labor And Industry, 651
 Boas St, Harrisburg, Pa (Subdivision Code) (Place-Political Subdivision)

In **DAUPHIN** County [22] on or about **JUNE OF 2020 TO SEPTEMBER OF 2020**
 (County Code)

POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-158-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R306413-2</i>	Complaint/Incident Number BCE-210272
Defendant Name:	First: DERRICK	Middle: M	Last: SMITH

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.)

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	3922	A3	of the	TITLE 18	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 obtains or withhold property of another by deception namely the Pennsylvania Department of Labor and Industry of Pandemic Unemployment Assistance (PUA) Funds in the amount of \$17,960.00 while being employed by the City of Philadelphia Streets Department. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another.

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	3925	A	of the	TITLE 18	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The Defendant did, intentionally receive, retain or dispose of movable property described as Pennsylvania Department of Labor and Industry Pandemic Unemployment Assistance (PUA) Funds in the amount of \$17,960.00 knowing that it had been stolen or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner.

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	4911	A1	of the	TITLE 18	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 did knowingly make false entry into records submitted to the Pennsylvania Department of Labor and Industry to receive funds, namely: Pandemic Unemployment Assistance (PUA) Funds in the amount of \$17,960.00 knowing the records would be taken as genuine and required by law to be kept by others for information of the government.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-152-22</i>	Date Filed: <i>6/15/22</i>	OTN/LiveScan Number <i>R 306413-2</i>	Complaint/Incident Number BCE-210272
Defendant Name:	First: DERRICK	Middle: M	Last: SMITH

- 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.)

(Date)

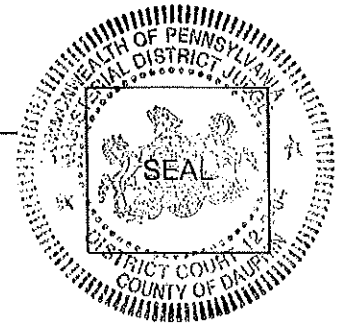
SATM Bole #790
 (Signature of Affiant)

AND NOW, on this date *JUNE 15, 2022* certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

12-2-04
 (Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-152-22</i>	Date Filed: <i>6/19/22</i>	OTN/LiveScan Number <i>R 306413-2</i>	Complaint/Incident Number BCE-210272
Defendant Name:	First: DERRICK	Middle: M	Last: SMITH

AFFIDAVIT of PROBABLE CAUSE

AFFIANT'S BACKGROUND

Your Affiant is Mark D. Bates, a Special Agent with the Pennsylvania Office of the Attorney General, Bureau of Criminal Investigations. Your Affiant has been employed by the Pennsylvania Office of Attorney General since January 2021, assigned as a Special Agent to the Eastern Regional Office, Bureau of Criminal Investigation Section. As a Special Agent, your Affiant's primary duties are to investigate crimes, interview and interrogate suspects and witnesses, prepare and execute search warrants, file criminal complaints and make arrests of criminal activity reported to the Office of Attorney General. Your Affiant has thirty-two years of law enforcement experience and prior to my employment with the Office of Attorney General, your Affiant was a Detective for twenty-six of those years with the Cheltenham Township Police Department, Montgomery County, Pennsylvania. During the course of your Affiant's law enforcement career, your Affiant has prepared and served search warrants and arrest warrants for various crimes enumerated in the Pennsylvania Crimes Code including but not limited to offenses involving various types of thefts, robbery, burglary, assaults, sex crimes, drug violations and homicides.

BACKGROUND OF INVESTIGATION

On March 27, 2020, the CARES Act was signed into law, which included Title II, Subtitle A, "Relief for Workers Affected by Coronavirus Act." Section 2102 of the CARES Act created a temporary federal program called Pandemic Unemployment Assistance (PUA) that in general provides up to 39 weeks of unemployment benefits and provides funding to the states for administration of the program. The PUA program provides unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who have exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania. PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups are explicitly defined as being ineligible to receive PUA: "Inmates; Retirees with no job and no job offer; Individuals who were not working at all or did not have a job offer; Children who were not working in actual employment; Individuals being paid to file other people's PUA application; College Students with no job and no job offer; Individuals on Social Security Disability with no work attachment; Claimants who work as an employee and qualify under regular Unemployment Compensation; Individuals living in a halfway house on lock-down; and Landlords". Additionally, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA benefits. You may also be subject to criminal prosecution." On June 1, 2020, The Pa. Office of Attorney General received a referral letter from the Governor's office referring investigation and prosecution of PUA related fraud based upon the findings of an audit conducted by the Pa. Dept. of Labor & Industry.

FRAUDULENT CLAIM

The Pennsylvania Department of Labor and Industry reported Derrick M. Smith B/M, 5-23-1982, SSN 1 (as referenced on Confidential Information Form), 435 E. Penn St, Philadelphia, Pennsylvania, 19144 and 6731 N. 16th St, Philadelphia, PA 19126, Ph # 267-333-8368, Tbksmith215@gmail.com, applied for PUA in June of 2020 and received PUA benefit payments. The Pennsylvania Office of Attorney General contacted the Pennsylvania Department of Labor and Industry and requested the application and payment information regarding Derrick M. Smith claim. Pennsylvania Department of Labor and Industry records show that Smith's application for PUA was submitted on June 08, 2020. On the application it was reported that Smith's last day of employment was 2/24/2020 and Smith was "laid off due to a lack of work after a business closure caused by COVID-19". However, a check of the Pennsylvania Department of Labor and Industry employment database revealed Smith was employed by the City of Philadelphia during all four Quarters of 2020. The Office of the Inspector General (OIG) for the City of Philadelphia confirmed that Smith, employee number 293800, 435 E, Penn St, Phila, PA 19144 was employed full time as an Asphalt Raker for the City of Philadelphia, Streets Department during the period for which he received benefits, and that no wages were lost due to the COVID-19 pandemic. Applicants were required to complete weekly certifications of their employment status in order to continue to receive benefits,



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-152-22</i>	Date Filed: <i>6/19/22</i>	OTN/LiveScan Number <i>R 306413-2</i>	Complaint/Incident Number BCE-210272
Defendant Name:	First: DERRICK	Middle: M	Last: SMITH

Pennsylvania Department of Labor and Industry records indicate certifications were submitted for each of the 20 weeks Smith received benefits.

The Pennsylvania Department of Labor and Industry also provided information regarding the payments made to Smith. Records show that Smith received payments for weeks of 02/29/2020, 03/07/2020, 03/14/2020, 03/21/2020 and 03/28/2020. The total payment represents payments in the amount of \$448.00 for each week for a total amount of \$2,240.00. In addition, Smith received payments for weeks of 04/04/2020, 04/11/2020, 04/18/2020, 04/25/2020, 05/02/2020, 05/09/2020, 05/16/2020, 05/23/2020, 05/30/2020, 06/06/2020, 06/13/2020, 06/20/2020, 06/27/2020, 07/04/2020 and 07/11/2020. The total payment represents payments in the amount of \$1,048.00 for each week for a total amount of \$15,720.00. The total for all the payments was \$17,960.00. The payments were from the last day of work listed on Smith's application to July 11, 2020. These payments directly coincide with the time that Smith was employed with the City of Philadelphia. The PUA payments were made using a US Bank pre-paid debit card with the last four numbers 2199. This card was sent to 435 East Penn Street, Philadelphia, Pennsylvania, 19144, Phone number 267-333-8368 was used on the application as Smith's phone number. As a part of this investigation, your Affiant using the Philadelphia Board of Revision of Taxes website conducted a property records search for this address, which revealed the property is owned by Leroy A and Rosalie Smith, believed to be relatives of Derrick Smith. Your Affiant queried a law enforcement database which revealed a current address for Smith to be 6731 N 16th Street, Philadelphia, Pennsylvania, 19126, Phone number of 267-333-8368, the same phone number on the application. In addition, a check of the Phone number 267-333-8368, revealed it belonged to 435 East Penn Street, Philadelphia, Pennsylvania, 19144 as recent as October 8, 2021.

SEARCH WARRANT US BANK and WELLS FARGO RECORDS

Based on the above information, your affiant applied for a search warrants for US Bank and Wells Fargo Records. On Wednesday October 27, 2021 at approximately 0942 Hrs. MDJ Sonya McKnight, District Court 12-2-04, 1805 N Cameron Street, Harrisburg, PA 17103, signed and sealed Search Warrants # BCE-210272-1 and BCE-210272-2 for US Bank and Wells Fargo bank records for Derrick Smith.

On Wednesday October 27, 2021 at approximately 1017 Hrs, your affiant served Search Warrant # BCE-210227-1 at CT Corporation registered agent for US Bank, 600 North 2nd St, Suite, 401, Harrisburg, PA 17101.

On Wednesday October 27, 2021 at approximately 1036 Hrs. your affiant served Search Warrant # BCE-210272-2 at Wells Fargo Bank, 30 North 3rd St, Suite 100, Harrisburg, PA 17101, Manager: Mahamane Sani.

On November 3, 2021, your Affiant received records from US Bank in response to the search warrant served on October 27, 2021. The US Bank records indicate card # 3835797956 is listed to Derrick M. Smith, dob: May 23, 1982, 435 E. Penn St, Philadelphia, PA 19144, ph # 267-333-8368. Payments are as follows:

Card ID	U.S. Bank: ACH from Known Remitter		
3835797956	Remitter: COMM OF PA UCD [1031301024] UC BENEFITS - Payee: DERRICK SMITH - SEC: PPD	7/15/2020	\$3,000
3835797956	Remitter: COMM OF PA UCD [1031301024] UC BENEFITS - Payee: DERRICK SMITH - SEC: PPD	7/15/2020	\$2,240.00
Total Payments Received by US Bank Account			\$5,240.00

On December 7, 2021, your Affiant received records from Wells Fargo in response to the search warrant served on October 27, 2021. The Wells Fargo records indicate the two checks issued to Derrick M. Smith, 435 E. Penn St, Philadelphia, PA 19144 numbered 1101281973 in the amount of \$6,000.00 and 1101244684 in the amount of \$6,720.00 were deposited into Wells Fargo Account No. 1540445739 on 06-16-21. This Wells Fargo Account No. 1540445739 belongs to Derrick Smith, 435 E Penn St, Philadelphia PA 19144-5882, DOB 05/23/1982, SSN 180-64-9500. Total loss: \$12,720.00.

US Bank records and Wells Fargo records indicate the total loss to be \$17,960, which confirms the Pennsylvania Labor and Industry records.

CONCLUSION



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR 152-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306 413-2</i>	Complaint/Incident Number BCE-210272
Defendant Name:	First: DERRICK	Middle: M	Last: SMITH

Your affiant respectfully requests the issuance of an Arrest Warrant be issued for Derrick M. Smith for the above named violations of the Pennsylvania Crimes Code. All the information contained within this Affidavit of Probable Cause is true and correct, to the best of my belief, so says the signed Affiant.

I, SA MARK BATES, 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.

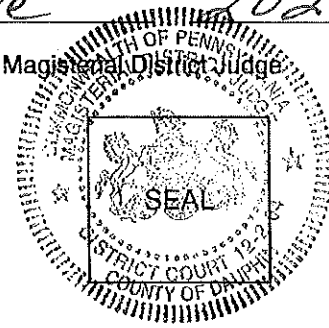
SA Mark Bates #790

(Signature of Affiant)

Sworn to me and subscribed before me this 15th day of June 2022

6/15/22 Date 

Magisterial District Judge



My commission expires first Monday of January,

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: DAUPHIN

Magisterial District Number:
MDJ: Hon. MDJ Sonya McKnight
Address: 1805 North Cameron St
Harrisburg, PA 17103

Telephone: (717)233-3599



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

J'MAR MAURICE HENDERSON
First Name Middle Name Last Name

927 Bridge Street
Philadelphia, PA 19124

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Limited
- 3-Felony Surrounding States
- 4-Felony No Extradition
- 5-Felony Pending Extradition
- 6-Felony Pending Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending Extradition
- F-Misdemeanor Pending Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <i>CP-150-22</i>	Date Filed 06/15/2022	OTN/LiveScan Number <i>R 306 402-5</i>	Complaint/Incident Number FCE-21-0018	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 07/30/1977	POB	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"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <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.)
FBI Number	MNU Number			
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:				

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat	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).

DAG SUZANNE EDWARDS
(Name of the attorney for the Commonwealth)

Suzanne Edwards
(Signature of the attorney for the Commonwealth)

06/15/2022
(Date)

I, KATHRYN GRADY
(Name of the Affiant)

797

(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] on or about June 7, 2022 - Sept. 9, 2022
(County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-150-22</i>	Date Filed: <i>6/18/22</i>	OTN/LiveScan Number <i>R 306402-5</i>	Complaint/Incident Number FCE-21-0018
Defendant Name:	First: J'MAR	Middle: MAURICE	Last: HENDERSON

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	3922	A2	of the	18 PA C.S.A.	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): **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: J'Mar Henderson intentionally filed fraudulent applications for the Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website for himself 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 \$49,568.

<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	3925	A	of the	18 PA C.S.A.	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: In that the Defendant, is guilty of theft if he intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. TO WIT: J'Mar Henderson filed for Pandemic Unemployment Assistance benefits for himself and received the funds from the benefit program while fully employed with the City of Philadelphia, knowing he did not qualify for such benefits.

<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	4911	A1	of the	18 PA C.S.A.	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**

Acts of the accused associated with this Offense: In that 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: J'Mar Henderson knowingly used false or fraudulent information in order to file applications for Pandemic Unemployment Assistance program through the PA Department of Labor and Industry website.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-150-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306 402-5</i>	Complaint/Incident Number FCE-21-0018
Defendant Name:	First: J'MAR	Middle: MAURICE	Last: HENDERSON

- 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 5.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

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

 (Date) (Year)

[Handwritten Signature]

 (Signature of Affiant)

AND NOW, on this date JUNE 15, 2022 I certify that the complaint has been properly completed and verified.

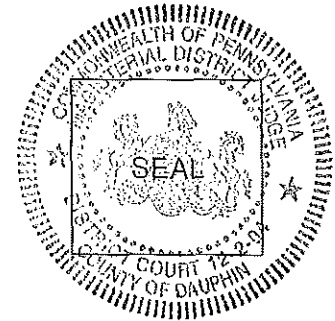
An affidavit of probable cause must be completed before a warrant can be issued.

12-2-04

 (Magisterial District Court Number)

[Handwritten Signature]

 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-150-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R306402-5</i>	Complaint/Incident Number FCE-21-0018
Defendant Name:	First: J'MAR	Middle: MAURICE	Last: HENDERSON

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. AFFIANTS' 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 COMPLAIN

Docket Number: CR-150-22	Date Filed: 6/19/22	OTN/LiveScan Number R 306402-5	Complaint/Incident Number FCE-21-0018
Defendant Name:	First: J'MAR	Middle: MAURICE	Last: HENDERSON

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 (US-DOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry (PA-DOL) administers the program in Pennsylvania.

PUA is only for individuals who are unemployed due to COVID-19 reasons and does not cover individuals without an attachment to the labor market or those who are unemployed for non-COVID-19 reasons. This benefit is only for individuals who would otherwise be working but are unable to because of the current pandemic. According the PA-DOL'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, the Pennsylvania Department of Labor & Industry's website states that "Knowingly making false statements or omitting material facts to obtain PUA benefits to which you are not entitled will result in a disqualification and repayment of all overpaid PUA and corresponding FPUC benefits. You may also be subject to criminal prosecution." On June 1, 2020, the Pennsylvania Office of Attorney General



POLICE CRIMINAL COMPLAIN

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received a referral letter from the Governor’s office referring investigation and prosecution of PUA-related fraud based upon the findings of an audit conducted by the PA-DOL.

III. INVESTIGATION

On October 18, 2021, the Philadelphia Office of Inspector General referred this investigation to the Office of Attorney General (OAG) based upon records that City of Philadelphia employees were receiving PUA benefits while still actively employed with the City. J’mar Henderson was one of the City of Philadelphia employees referred to this agency for investigation. Henderson began his employment with the City on June 25, 2018, and remained consistently employed there at least through December 31, 2021. Payroll records reflect that Henderson did not see a reduction in employment hours and received full payroll checks between January 5, 2020, and September 26, 2021. The PUA program expired in Pennsylvania on September 4, 2021.

On June 7, 2020, Henderson completed a PUA application on the PA-DOL website. Henderson’s application listed his address as 927 Bridge Street, Philadelphia, PA 19124, which is the same address listed in his City of Philadelphia employment records. His application also listed telephone number (267) 312-9087. The application indicated his last day of work with the City of Philadelphia was on January 9, 2020, and that he was currently unemployed. Henderson also indicated that he was laid off of work due to a business closure. PUA applications required each applicant to certify that the information submitted to PA-DOL was true and correct. Prior to submission, Henderson completed this certification.

On June 8, 2020, PA-DOL issued Henderson two checks: Check # 1101201150 in the amount of \$3,000, and Check # 1101105589 in the amount of \$7,436, drawn on Commonwealth of Pennsylvania Wells Fargo Bank account ending in 4557. Your Affiant obtained records from Wells Fargo Bank via Search Warrant and determined that the above checks were cashed at the Wells Fargo Bank branch located on 6420 Frankford St.,



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Docket Number: CR-150-22	Date Filed: 6/13/22	OTN/LiveScan Number R 306402-5	Complaint/Incident Number FCE-21-0018
Defendant Name:	First: J'MAR	Middle: MAURICE	Last: HENDERSON

Philadelphia, PA 19135. Your affiant further determined that these checks were cashed with Pennsylvania Driver's License # 264 407 29, which belongs to Henderson.

Additional PUA benefits were issued to Henderson on two, US Bank Prepaid Debit Cards ending in 3035 and 7308, which were both mailed to his address, 927 Bridge Street, Philadelphia, PA 19124. According to US Bank records obtained via Search Warrant, Henderson activated US Bank Debit Card 4912 8810 2266 3035 on June 21, 2020. Henderson then reported US Bank Card ending in 3035 as "lost" on August 12, 2020. US Bank subsequently issued Henderson a second debit card, 4912 8810 3653 7308, which was activated on August 18, 2020. PUA funds were issued to Henderson's US Bank Card on a weekly basis pending his responses on the PA-DOL website. In order to continue receiving PUA benefits, the applicant was required to file weekly certifications. As part of the weekly recertification process, the applicant must indicate if they earned any wages. If wages were reported, it would affect the amount of benefits the applicant received or render the applicant ineligible for benefits.

The records provided by PA-DOL and US Bank indicate that Henderson received a total of \$49,568 in PUA benefits. Henderson's employment records indicate that he was continuously employed with the City of Philadelphia and did not see a reduction of hours. Therefore, Henderson's gainful employment during this time period makes him ineligible to have received these PUA benefits.

IV. 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 J'Mar Henderson fraudulently obtained Pandemic Unemployment Assistance benefits. This investigation, which included records provided by the Pennsylvania Department of Labor and Industry, Pennsylvania Treasury, Wells Fargo, and US Bank, revealed that Henderson filed a PUA application and received \$49,568 in benefits for which he was not eligible. The PUA



POLICE CRIMINAL COMPLAINT

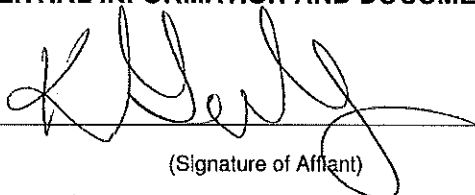
Docket Number: <i>CR-150-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number: <i>R 306402-5</i>	Complaint/Incident Number: FCE-21-0018
Defendant Name:	First: J'MAR	Middle: MAURICE	Last: HENDERSON

applications and weekly certifications specifically state that all information provided must be "true and complete." The certification also requires the applicant to acknowledge that any false statements made on the application is a criminal offense.

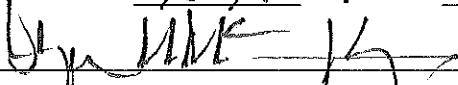
The information above is based upon evidence gathered during the course of this investigation, which your Affiant believes to be true and correct to the best of her knowledge. Based upon the aforementioned facts, your Affiant respectfully requests an arrest warrant be issued for the defendant J'Mar Henderson.

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.

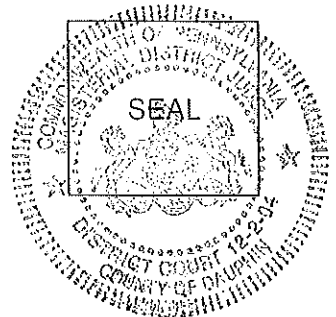
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.



 (Signature of Affiant)

Sworn to me and subscribed before me this 15th day of JUNE 2022
JUNE 15, 2022 Date , Magisterial District Judge

My commission expires first Monday of January, 2028



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



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: _____ (NAME and ADDRESS):
SHANAE N **JOHNSON**
 First Name Middle Name Last Name Gen
 597 Anchor St., Philadelphia, PA 19120

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 Detem.	<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 <i>CR-146-22</i>	Date Filed <i>06/19/22</i>	OTN/ LiveScan Number <i>R 306291-6</i>	Complaint Number BCE-210270	Incident Number BCE-210270	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 11/03/1989	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
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 checked="" type="checkbox"/> Non-Hispanic	<input type="checkbox"/> Unknown		
Hair Color	<input type="checkbox"/> GRY (Gray)	<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"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)
	<input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color	<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)
	<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> XXX (Unknown)
DNA	<input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number				
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:				5	4

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).

DAG KATHERINE MCDERMOTT _____ *approved electronically 6/9/2022* _____
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, SA TARYN LIEBTAG BADGE #812
 (Name of the Affiant) (PSP/MP/ETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General PA0222400
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] PA Dept Of Labor And Industry, 651 Boas St., Harrisburg, PA 17121 (Subdivision Code) (Place-Political Subdivision)

in DAUPHIN County [22] on or about JUNE 2020 TO SEPTEMBER 2021
 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-146-22	Date Filed: 06/19/22	OTN/LiveScan Number R 306291-6	Complaint/Incident Number BCE-210270
Defendant Name:	First: SHANAE	Middle: N	Last: JOHNSON

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.)

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 checked="" type="checkbox"/>	1	3922	A3	of the TITLE 18	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 intentionally obtained the property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced. Shanae Johnson applied for and received \$47,370.00 of Pennsylvania Department of Labor and Industry Pandemic Unemployment Assistance (PUA) funds by creating and repeatedly reinforcing the false impression that she was no longer employed by the City of Philadelphia, Department of Human Services.

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"/>	2	3925	A	of the TITLE 18	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): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: The defendant intentionally received and retained \$47,370.00 in movable property belonging to the Pennsylvania Department of Labor and Industry, knowing that it had been stolen.

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"/>	3	4911	A1	of the TITLE 18	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**

Acts of the accused associated with this Offense: A person commits the offense if he knowingly makes 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. Defendant Shanae Johnson made false entries in the Pandemic Unemployment Applications she submitted.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-146-22</i>	Date Filed: <i>26/09/22</i>	OTN/LiveScan Number <i>R 306 291-6</i>	Complaint/Incident Number BCE-210270
Defendant Name:	First: SHANAE	Middle: N	Last: JOHNSON

- 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.
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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 TARYN LIEBTAG

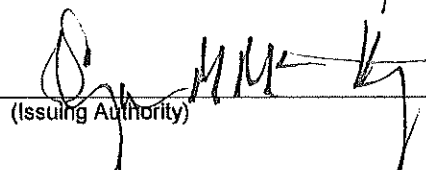
6/10/2022
(Date)

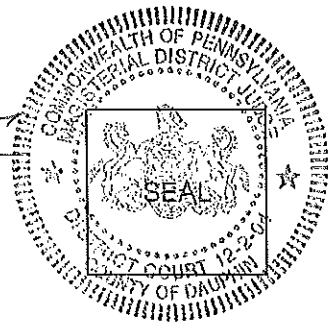

(Signature of Affiant)

AND NOW, on this date JUNE 15, 2022 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.

12-2-04
(Magisterial District Court Number)


(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-146-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R306291-6</i>	Complaint/Incident Number BCE-210270
Defendant Name:	First: SHANAE	Middle: N	Last: JOHNSON

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Taryn Liebtog, #812, of the Pennsylvania Office of Attorney General (OAG) being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant has been assigned to the Eastern Regional Office, Bureau of Criminal Investigation Section of the Office of Attorney General since July 2020. As a Special Agent, your Affiant's primary duties are to investigate crimes, interview and interrogate suspects and witnesses, prepare and execute search warrants, file criminal complaints and make arrests of criminal activity reported to the Office of Attorney General. Prior to becoming a Special Agent, your Affiant was a Consumer Protection Agent with the Office of Attorney General for 5 years, and in June 2018, became a Certified Fraud Examiner (CFE), which combines knowledge of complex financial transactions with an understanding of investigative techniques and legal issues. 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 white collar crimes, theft, and fraud.

II. BACKGROUND OF INVESTIGATION

On 3/27/2020, 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 provided up to 79 weeks of unemployment benefits and provided funding to the states for administration of the program. The PUA program provided unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA was only available to individuals who were unemployed due to COVID-19 reasons and did not cover individuals without an attachment to the labor market or those who were unemployed for non-COVID-19 reasons. This benefit was only for individuals who would otherwise be working but were unable to because of the pandemic. According the Pennsylvania Department of Labor & Industry's website, the following groups were 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, the Pennsylvania Department of Labor & Industry's website stated 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."



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Defendant Name:	First: SHANAE	Middle: N	Last: JOHNSON

III. FRAUDULENT CLAIM

The Pennsylvania Department of Labor and Industry (Labor and Industry) reported that on 6/16/2020, Shanae N. Johnson, DOB 11/03/1989, SSN 1 (as referenced on Confidential Information Form) applied for PUA benefits. Applicants could receive benefits for lost wages predating their application, and Johnson applied for and was awarded benefits for weeks ending on 3/21/2020 through 9/04/2021. Applicants were required to complete weekly certifications of their employment status in order to continue to receive benefits, and Labor and Industry records show that certifications were submitted for each week Johnson received benefits.

Labor and Industry also provided application and payment information regarding Shanae N. Johnson's claims, which show that Johnson's PUA application submitted on 6/16/2020 was filed using DOB 11/03/1989, SSN 1, email address armj1216@gmail.com, and phone number 215-834-9407. On the application it was reported that Johnson was unemployed as a direct result of a pandemic or major disaster and that the major disaster was "COVID-19". On the application it was reported that Johnson's last day of employment was 3/17/2020, and that she was "Not Working". On 01/22/2021, two applications were filed to reopen the claim (providing the same identifying and contact information), which again reported Johnson's last day of employment as 3/17/2020. These applications again reported that Johnson was unemployed as a direct result of a pandemic or major disaster and that the major disaster was "COVID-19".

Information provided by Labor and Industry shows that PUA payments were made to US debit card(s) associated with US Bank account / customer ID XXXXX6678 held by Shanae Johnson (DOB 11/03/1989, SSN 1, email address armj1216@gmail.com, and phone number 215-834-9407).

According to the PA Department of Labor and Industry employment database, the City of Philadelphia reported wages for Shanae Johnson (SSN 1) for all quarters of 2020 and 2021. Additionally, AmeriBest Home Care Inc. reported wages for Johnson for all quarters of 2020. The Office of the Inspector General for the City of Philadelphia confirmed that Johnson was employed full time as a Social Work Services Manager 2 for the City of Philadelphia, Department of Human Services during the period for which she received benefits, and that no wages were lost due to the COVID-19 pandemic.

IV. US BANK SEARCH WARRANT

Based on the above information, your affiant obtained a search warrant for US Bank account records associated with Shanae Johnson. US Bank provided card holder information, card information, and transaction history in reference to Customer ID XXXXX6678, associated with Shanae Johnson, DOB 11/03/1989 with an address of 3232 W. York St., Philadelphia, PA 19132.

From 6/30/2020 to 9/30/2021, fifty-eight (58) payments totaling \$47,370.00 were deposited onto the account's debit cards by the Commonwealth of PA for "UCBENEFITS", listing the payee as Shanae Johnson. Between 7/23/2020 and 4/28/2021, nine (9) transactions took place, transferring \$17,725.00 from Johnsons' US Bank debit card XXXXXX0323 to



POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: SHANAE	Middle: N	Last: JOHNSON

Police and Fire Federal Credit Union FAN1 (as referenced on Confidential Information Form) via Automated Clearing House (ACH) withdrawal. Account records for each transaction referenced "Shanae Johnson" and "Personal Checking".

V. POLICE AND FIRE FEDERAL CREDIT UNION SEARCH WARRANT

Based on the above information, your affiant obtained a search warrant for Police and Fire Federal Credit Union (PFFCU) account records associated with FAN1. PFFCU provided account holder information, monthly statements, and deposit and withdrawal information in reference to FAN1, an account held by Shanae Johnson, DLN1, SSN1, DOB 11/03/1989, with an address of 3232 W. York St., Philadelphia, PA 19132.

A review of Johnson's PFFCU statements confirmed transactions which correspond with the US Bank transfers – nine (9) deposits cleared Johnson's account between 7/24/2020 and 4/29/2021. The transactions were all labeled "Deposit ACH" and totaled \$17,725.00. Each deposit corresponded with a withdrawal of the same amount from Johnson's US Bank account. During the time that Johnson was receiving PUA benefits, numerous biweekly deposits appear on the FAN1 statements, identified as "Deposit ACH City of Phila". There are also a number of regular deposits until 12/2020, which appear to be income from a secondary job, labeled as "Deposit ACH AMERIBEST HOME C".

VI. CITY OF PHILADELPHIA EMPLOYMENT RECORDS

On 1/25/2022, the Office of the Inspector General for the City of Philadelphia provided employment records which showed that Shanae Johnson (SSN 1) was employed by the City of Philadelphia during the time she was collecting PUA benefits. The data they provided showed that Johnson was working regularly and receiving direct deposit payments from the City of Philadelphia except for a period from 10/20/2020 – 1/06/2021, when Johnson was out on unpaid leave either categorized as "FMLA" or otherwise "unpaid leave". Aside from the segment of unpaid leave, Johnson received biweekly paychecks and 3 salary increases from the City of Philadelphia while collecting PUA benefits.

VII. CONCLUSION

Per the CARES Act, PUA was only available to individuals who were unemployed due to COVID-19 reasons. While Johnson was employed by the City of Philadelphia, she applied for PUA benefits on 6/16/2020 and again on 1/22/2021. During that time, she received \$47,370.00 in benefits and submitted regular weekly certifications confirming she was unemployed.

Affiant requests an arrest warrant charging Shanae N. Johnson with 18 Pa.C.S.A. § 3922(a)(3) Theft By Deception, § 3925(a) Receiving Stolen Property, and § 4911(a)(1) Tampering with Public Records.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-146-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number: <i>R 306291-6</i>	Complaint/Incident Number: BCE-210270
Defendant Name:	First: SHANAE	Middle: N	Last: JOHNSON

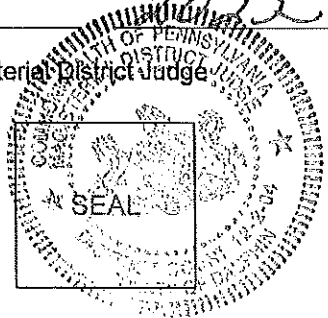
I, SA TARYN LIEBTAG, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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.

6/10/22 *Taryn Liebtag* # *812*
(Signature of Affiant)

Sworn to me and subscribed before me this *15th* day of *JUNE*
6/15/2022 Date *[Signature]*, Magisterial District Judge

My commission expires first Monday of January, *2028*



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



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
STACEY **DJUAN** **MOULTRIE**
 First Name Middle Name Last Name Gen
 8061 TEMPLE ROAD
 PHILADELPHIA PA. 19150

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 <i>CR-147-22</i>	Date Filed <i>06/13/22</i>	OTN/LiveScan Number <i>R-306320-D</i>	Complaint Number BCE-210274	Incident Number	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 11/15/1957	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name		Last Name	
AKA				Gen.	
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 checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> BLK (Black) <input checked="" 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 type="checkbox"/> BRO (Brown)
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<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)
<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)			
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number	MNU Number				
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:				5	4

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).

DAG KATHERINE MCDERMOTT
 (Name of the attorney for the Commonwealth)
Approved electronically 6/10/2022
 (Signature of the attorney for the Commonwealth) *6/10/2022*
 (Date)

I, **S/A MICHAEL MCNICHOLAS** **BADGE #853**
 (Name of the Affiant) (PSP/MP/OTC -Assigned Affiant ID Number & Badge #)

of **Pennsylvania Office of Attorney General** **PA022400**
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

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

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [301] PA Dept Of Labor And Industry, 651 Boas St., Harrisburg, PA 17121 (Subdivision Code) (Place-Political Subdivision)

In DAUPHIN County [22] on or about JUNE 2020 TO NOVEMBER 2020 (County Code)



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-144-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R 306320-0</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

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 _____
--	---	--	--	---

<input checked="" type="checkbox"/> Lead?	1	4911	AZ	of the	TITLE 18	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
-------------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS**

Acts of the accused associated with this Offense: A person commits an offense if he/she knowingly makes 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. Defendant Stacey D. Moultrie made false entries in the Pandemic Unemployment Applications she submitted with the intention to defraud the government.

<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?	2	3922	A3	of the	TITLE 18	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
-------------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: A person is guilty of theft if he/she intentionally obtains or withholds property of another by deception. A person deceives if he/she intentionally fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he/she stands in a fiduciary or confidential relationship. Stacey D. Moultrie applied for and received \$20,805.00 of Pennsylvania Department of Labor and Industry Pandemic Unemployment Assistance (PUA) funds by creating and repeatedly reinforcing the false impression that she was no longer employed by the City of Philadelphia, Department of Human Services.

<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?	3	3925	A	of the	TITLE 18	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
-------------------------------------	-----------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **RECEIVING STOLEN PROPERTY**

Acts of the accused associated with this Offense: A person is guilty of theft if he/she intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. The defendant intentionally received and retained \$20,805.00 in movable property belonging to the Pennsylvania Department of Labor and Industry, knowing that it had been stolen.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-147-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R 306-320-0</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

- 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 8.
- 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.)

S/A MICHAEL MCNICHOLAS

_____ (Date)

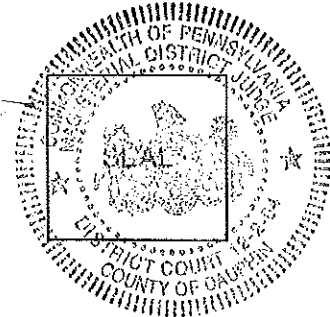
_____ (Signature of Affiant)

AND NOW, on this date JUNE 15, 2022 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.

12-2-04
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-147-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R 306-320-0</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Michael McNicholas, #853, of the Pennsylvania Office of Attorney General (OAG) being duly sworn to law, depose and say:

I. AFFIANT'S BACKGROUND

Your Affiant, Michael McNicholas, #853, is a sworn Special Agent with the Pennsylvania Attorney General, Bureau of Criminal Investigation. As a Special Agent, your Affiant's Primary duties are to investigate crimes, interview suspects and witnesses, prepare and execute search warrants, file criminal complaints and make arrests for criminal activity reported to the Office of the Attorney General. Your Affiant has approximately thirty two years of law enforcement experience prior to employment with the Office of the Attorney General as a patrol officer and narcotics investigator with the City of Philadelphia. During your Affiant's career, your Affiant has investigated crimes including but not limited to gun violence, robbery, assaults, thefts, identity thefts, violations of the Uniform Firearms Act, and Pennsylvania Controlled Substance, Drug Device, and Cosmetics Act.

The facts set forth in this affidavit are based upon your Affiant's knowledge; knowledge obtained from other individual/entities during their participation in this investigation, including other law enforcement personnel; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; as well as information gained through our training and experience.

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 provided up to 79 weeks of unemployment benefits and provided funding to the states for administration of the program. The PUA program provided unemployment assistance to individuals not eligible for regular unemployment compensation (UC) or extended benefits under state or Federal law, including those who exhausted all rights to such benefits. While the U.S. Department of Labor (USDOL) oversees the Pandemic Unemployment Assistance (PUA) program, the Pennsylvania Department of Labor & Industry administers the program in Pennsylvania.

PUA was only available to individuals who were unemployed due to COVID-19 reasons and did not cover individuals without an attachment to the labor market or those who were unemployed for non-COVID-19 reasons. This benefit was only for individuals who would otherwise be working but were unable to because of the pandemic. According to the Pennsylvania Department of Labor & Industry's website, the following groups were 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, the Pennsylvania Department of Labor & Industry's website stated 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."



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-147-22</i>	Date Filed: <i>06/18/22</i>	OTN/LiveScan Number <i>R 306-320-0</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

III. FRAUDULENT CLAIM

The Pennsylvania Department of Labor and Industry (Labor and Industry) reported that Stacey Djuan Moultrie, DOB 11/15/1957, SSN 1 (as referenced on Confidential Information Form) applied for PUA on 6/18/2020 and received twelve (12) weeks of benefit payments. Applicants could receive benefits for lost wages predating their application, and Moultrie applied for and received benefits for weeks ending on 4/9/2020 through 8/29/2020. Applicants were required to complete weekly certifications of their employment status in order to continue to receive benefits, and Labor and Industry records show that certifications were submitted for each week Moultrie received benefits.

Labor and Industry also provided application and payment information regarding Stacey Djuan Moultrie's claims, which show that Moultrie's PUA application submitted on 6/18/2020 was filed using DOB 11/15/1957, SSN 1, email address stacey55@icloud.com, and phone number 215-738-6837. On the application it was reported that Moultrie's last day of employment was 4/8/2020, and that she was "Not Working".

Information provided by Labor and Industry shows that PUA payments were made to US debit card(s) associated with US Bank account / customer ID XXXXX0234 (FAN1) held by Stacey Moultrie (DOB 11/15/1957, SSN 1, email address stacey55@icloud.com, and phone number 215-738-6837) as well as two Wells Fargo checks totaling \$10,550.00.

A check of the Labor and Industry employment database showed that Stacey Djuan Moultrie (SSN 1) was employed by the City of Philadelphia during Q1 of 2020 through Q2 of 2021. The Office of the Inspector General for the City of Philadelphia confirmed that Moultrie was employed full time as a Social Work Services Manager 2 for the City of Philadelphia, Department of Human Services during the period for which she received benefits, and that no wages were lost due to the COVID-19 pandemic.

IV. US BANK SEARCH WARRANT

On October 27, 2021 SA James Dunlap obtained Search Warrant 210274-1 for CT Corporation Registered Agent for US Bank to provide all documents and account information in reference to US Bank account/customer ID XXXXX0234 (FAN1) associated with Stacey D. Moultrie, DOB: 11/15/1957. This Search Warrant was served on CT Corporation located at 600 N. 2nd Street, Suite 401, Harrisburg, PA 17101 on 10/27/2021 at approximately 10:17 AM.

Search Warrants 210274-1 was reviewed and approved by SDAG Thomas Ost-Prisco on 10/25/2021 and Signed by Dauphin County Pennsylvania Magisterial District Judge Sonya M. McKnight on 10/27/2021.

As a result of Search Warrant 210274-1, US Bank provided the following; Zip File containing, cardholder information with the name Moultrie, Stacey D. 16-digt Card Number: XXXXXXXXXXXX6067 (FAN2), 8061 Temple Road 19150, Birth Date: November 15, 1957, Home Phone: 2157386837 and email address stacey55@icloud.com. Transaction history and IP address were also provided.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-147-22</i>	Date Filed: <i>06/13/22</i>	OTN/LiveScan Number <i>R-306320-0</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

V. WELLS FARGO SEARCH WARRANT

On October 27, 2021 SA James Dunlap also obtained was Search Warrant 210274-2 for Wells Fargo Bank to identify the Bank and account of First Deposit for Wells Fargo Bank PUA checks #1101562277 and #1101555560 issued in the name Stacey D. Moultrie. This Search Warrant was served on Wells Fargo Bank, Harrisburg Capitol Branch located at 30 N. 3rd Street, Suite 100, Harrisburg, PA 17101 on 10/27/2021 at approximately 10:36 AM.

Search Warrants 210274-2 was reviewed and approved by SDAG Thomas Ost-Prisco on 10/25/2021 and Signed by Dauphin County Pennsylvania Magisterial District Judge Sonya M. McKnight on 10/27/2021.

As a result of Search Warrant 210274-2, Wells Fargo Bank provided Zip File, Case #25850009, containing a Business Records Declaration referencing check # 1101562277 in the amount of \$5400.00 was credited to Police and Fire Federal Credit Union and check # 1101555560 in the amount of \$5150.00 was credited to the Police and Fire Federal Credit Union.

VI. POLICE AND FIRE FEDERAL CREDIT UNION SEARCH WARRANT

Search Warrant 210274-4 was obtained on December 27th, 2021 for the aforementioned Police and Fire Federal Credit Union Banking records and voided shortly thereafter when it was determined the warrant did not specify a specific time frame for the requested Police and Fire Federal Credit Union banking records. This Search Warrant was replaced with Search Warrant 210264-5.

On January 12th, 2022 the Police and Fire Federal Credit Union provided by email the requested banking records e.g., account holder information in the name of Stacey Moultrie, Account #XXXXXX2701 (FAN3), financial records including; monthly bank statements which included a Police and Fire Federal Credit Union transaction receipt dated 06/27/20 at 8:46am documenting \$5,400.00 deposit into Stacey Moultrie's checking account and a deposit of \$5,150.00 into Stacey Moultrie's saving account. This receipt also documents a withdrawal in the amount of \$1,000.00 in cash which Stacey Moultrie signed the receipt.

VII. STACEY D. MOULTRIE INTERVIEW

On Friday, March 25th, 2022 at 11:29am SA Michael McNicholas contacted Stacey Moultrie inquiring if she would be interested in being interviewed in reference to this investigation. Ms. Moultrie agreed to be interviewed on Wednesday, March 30th, 2022 at 9:00am at her residents, 8061 Temple Road Philadelphia PA. 19150.

On Sunday, March 27th, 2022 at 12:05pm SA McNicholas had a missed call from Ms. Moultrie. On Monday, March 28th, 2022 at 8:30am, Ms. Moultrie called SA McNicholas asking if she could reschedule her interview to today (March 28th, 2022) because her schedule was very busy the rest of the week. Ms. Moultrie called SA McNicholas again on March 28th at 9:02am stating that she didn't sleep all weekend and ask "What do I need to do, pay the money back? I only filed the claim based on overtime that I had lost, I didn't think I did anything wrong." After a brief discussion in reference to scheduling issues, Ms. Moultrie agreed to move forward on March 30th, 2022 with her interview.

On Wednesday March 30th, 2022 at 9:35am SA Michael McNicholas and SA Taryn Liebttag interviewed Stacey Moultrie in reference to her application for Pennsylvania Pandemic Unemployment Assistance (PUA) as well as the payments she received.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-144-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306320-0</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

Ms. Moultrie was shown the Pennsylvania Pandemic Unemployment Application Snapshot date June 18th, 2020 which she confirmed was the information she provided in order to receive PUA funds. Ms. Moultrie further confirmed, after being shown page 3 of the application that she requested a debit card as her method of payment, although initially she suggested that she did not recall requesting a debit card.

Ms. Moultrie was shown Wells Fargo PUA Check#1101555560 in the amount of \$5,150.00 and Check #1101562277 in the amount of \$5,400.00. Ms. Moultrie was also shown a receipt from the Police and Fire Federal Credit Union showing Account #XXXXXX2701 (FAN3) and the name MOULTRIE, STACEY at the top, confirming the checks were deposited into her checking and savings accounts on June 27th, 2020 at 8:46am and \$1000.00 in cash was withdrawn, which Ms. Moultrie signed the receipt. Moultrie confirmed that she did receive these checks and did deposit the checks into her PFFCU accounts.

Ms. Moultrie confirmed that she never had a break in employment from the city of Philadelphia and did not miss a pay check until her retirement. Ms. Moultrie was then ask about certifying her weekly earning on the PUA website to which she answered yes I did, but does not remember having a debit card. Moultrie further stated that she wasn't saying No, she just can't remember, but intends to search her lock box to see if she still has the card.

Ms. Moultrie was then ask what the reason was for her application for PUA assistance was, she stated that it was explained to her that if she lost overtime due to the pandemic she would be eligible for PUA funds. She further stated that at the time she didn't believe she was doing anything wrong but now she guesses she did. Moultrie went on to say that if she did anything wrong she will pay the money back, and that due to the processing time relating to her pension from the City of Philadelphia, she had enough money saved to pay the money back.

After SA McNicholas and SA Liebttag concluded the interview at 9:50am and left Ms. Moultrie's residence. Moultrie called SA McNicholas on his cell phone at 9:58am stating that she found the debit and wished to amend her interview to include that she did have the debit card and did receive PUA payment via the US Back debit card.

SA McNicholas and SA Liebttag returned to 8061 Temple Rd. and continued Ms. Moultrie's recorded interview at 10:09am. At that time Ms. Moultrie produced a US Bank debit card #XXXXXXXXXXXX6067 (FAN2) which expires on 06/25 in the name of Stacey M. Moultrie. Ms. Moultrie was then shown the Pennsylvania Pandemic Unemployment Assistance Claim history which she reviewed and confirmed that she did certify the weekly claims and did use the debit card but doesn't not remember specific transactions, just that she used the card. The interview was then concluded at 10:10am.

VIII. CITY OF PHILADELPHIA EMPLOYMENT RECORDS

On 1/25/2022, the Office of the Inspector General for the City of Philadelphia provided employment records which showed that Stacey D. Moultrie (SSN 1) was employed by the City of Philadelphia during the time she was collecting PUA benefits. The data they provided showed that Moultrie was working regularly and receiving direct deposit payments from the City of Philadelphia.



POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-144-22</i>	Date Filed: <i>6/13/22</i>	OTN/LiveScan Number <i>R 306320-D</i>	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE

IX. CONCLUSION

Per the CARES Act, PUA was only available to individuals who were unemployed due to COVID-19 reasons. While Moultrie was employed by the City of Philadelphia, she applied for PUA benefits on 6/18/2020 and received \$23,112.00 in benefits according to the Certain Government Payments 1099G. Moultrie also submitted regular weekly certifications confirming she was unemployed.

Affiant requests an arrest warrant charging Stacey D. Moultrie with 18 Pa.C.S.A. § 3921(a) Theft By Unlawful Taking, § 3922(a)(3) Theft By Deception, and § 3925(a) Receiving Stolen Property.

I, S/A MICHAEL MCNICHOLAS, 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 15th day of JUNE 2022
6/15/2022 Date [Signature], Magisterial District Judge
 My commission expires first Monday of January, 2028

