COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT **COMMONWEALTH OF PENNSYLVANIA** COUNTY OF: DAUPHIN Magisterial District Number: 12-2-04 VS. (NAME and ADDRESS): MDJ: Hon. MDJ Sonya McKnight Address: 1805 North Cameron St **AARON** ANDERSON-BUSH Gen First Name Middle Name Last Name Harrisburg, PA 17103 2054 E Willard St Philadelphia, Pennsylvania 19134 Telephone: (717)233-3599 <u>PARAJANARAPAHAHAR</u> 5-Felony Pending Extradition C-Misdemeanor Surrounding States 1-Felony Full ☐ Distance: 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Complaint/Incident Number Request Lab Services? Date Filed OTN/LiveScan Number **Docket Number** ☐ YES 🖾 NO ` 706 395 CR-148 611912 FCF210014 Co-Defendant(s) GENDER ров 02/23/1991 POB **BOO I'bbA** Middle Name Gen. Male First Name Last Name ☐ Female **AKA** ☐ While ⊠ Black Unknown RACE □ Aslan Native American Hispanic Non-Hispanic Unknown ETHNICITY RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) GRY (Gray) Hair BLK (Black) ONG (Orange) ☐ WHI (While) XXX (Unk./Bald) GRN (Green) PNK (Plnk) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye HAZ (Hazel) MAR (Maroon) PNK (Pink) Color XXX (Unknown) ☐ MUL (Multicolored) DNA ☐ YES ☐ NO **DNA Location** WEIGHT (lbs.) FBI Number **MNU Number** 150 Ft. HEIGHT In. **Defendant Fingerprinted** ☐ YES ☐ NO 5 9 Fingerprint Classification: **DEFENDANT VEHICLE INFORMATION** State Registration Comm'i Veh. School Veh. | Oth, NCIC Veh. Code Reg. Haz mat Ind, 🔲 same as Plate # Sticker (MM/YY) Def. Year Make Model Style Color VIN Office of the attorney for the Commonwealth Approved Disapproved because: (The attorney for the Commonwealth may require that the complaint, arrest warrant affidavlt, or both be approved by the attorney for the Commonwealth prior to filing, See Pa.R.Crlm.P. 507). PROVED UTA PHONE DAG SUZANNE EDWARDS 06/15/2022 ignature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) CAM LONG (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Afflant) Pennsylvania Office of Attorney General PA0222400 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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 🗂 Laccuse 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 (Place-Political Subdivision) Subdivision Code on or about JUNE 7, 2020 TO SEPTEMBER 9, 2021 in DAUPHIN County [22]

(County Code)



				PARTY F	OLI	CEC	KIMINAL	, COMPLAINT
Docket Number:	Date Filed:	OTN/L	IveScan Numb	er			laint/incident N	Number
CR-148-22	6/13/22 First:		<i>345-5</i> idle:	1	Last:	FCE2	210014	
Defendant Name:	AARON	iviic				ERSON	I-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.)								
Inchoate	☐ Solicitat				Num	iber of \	/Ictims Age 60 o	r Older
☑ 1 3922	A2	of the 18	3 PA C.S.A	1	F3			
Offense	ection Subsection	Entrate Manufacturing	PA Statute (Title)	Counts	<u> </u>	ade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			Interstate			Safety Zone	☐ Work Zone
Statute Description (in	clude the name of	statute or ordina	nce): THEFT BY	DECEPTION	NO			
Acts of the accused as	f (4) tet (4)	0.00		· · · · · · · · · · · · · · · · · · ·				
impression, including false in applications for the Pandem qualified to do so and that to correct, and where the fraudinchoate	ic Unemployment Assist he information provided dulent applications results.	ance program throu I was false, and whe Ited in benefit payme	gh the PA Departr re the Defendant ents of approximal spiracy	nent of Lab certified on cely \$52,87	or and the app	Industry olication	website for hims	elf knowing that he was r ion provided was true and
Offense 18 901	A 18 902	A 189	03					
☐ 2 491	.1 A1	of the 1	L8 PA C.S.A	1	F	3		
Lead? Offense#	Section Subse	action	PA Statute (Title)	Count		Grade	NCIC Offense	Code UCR/NIBRS Code
(if applicable)	Number		<u>-</u>	☐ Intersta			☐ Safety Zone	☐ Work Zone
Statute Description (in	clude the name of	statute or ordina	nce): TAMPERI	NG WITH	PUBLI	C RECO	RDS	
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								
Inchoate ☐ Attem Offense 18 90			ispiracy 03	Num	ber of	Victims	Age 60 or Older	
□ 3 392		STEER STEER STEER	18 PA C.S.A	1	F	3		
Lead? Offense#	Section Subs	ection	PA Statute (Title)	Count		Grade	NGIC Offense	
Statute Description (include the name of statute or ordinance): RECEVING STOLEN PROPERTY								
Acts of the accused as another knowing that it had Unemployment Assistance to said benefits.	been stolen, or believir	ng that it had probat	olv been stolen. TO	WIT: Aar	on Ande	erson-Bu	sh did unlawfully	recleve Pandemic

Pane 2 of 3



Docket Number:	Date Filed:	OTN/LiveScan Num	ber Complaint/Incident Number
CR-148-22		R 306395-5	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.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{}$.
- 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 that 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)

AND NOW, on this date 11/1/2 /5 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.

(Magisterial District Court Number)

(Issuing Authority)

Docket Number: CR-148-22	Date Filed:	OTN/LiveScan Number R 306 395-5	Complaint/Incident Number FCE210014
AND AND VALUE OF VEHICLE	First:	Middle:	Last:
Defendant Name:	AARON		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



Docket Number:	11.0199 121	OTN/LiveScan Number	Complaint/incident Number FCE210014		
THE PROPERTY OF THE PROPERTY O		Middle:	Last:		
Defendant Name:		}	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 the PA-DOL's website, the following groups are explicitly defined as being ineligible to receive PUA: Immates; 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.



Docket Number: CR-146-32	Date Filed: 0°	TN/LiveScan Number	Complaint/Incident Number FCE210014
	First:	Middle: La	ast:
Defendant Name:	AARON	A	NDERSON-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 recertified his unemployment status in order to continue receiving the PUA funds. Specifically, as part of the



Docket Number: CR-14B-22	Date Filed:	OTN/LiveScan Nur R 306 395	nber Complaint/incident Number FCE210014	
ELVERONING SERVICES	First:	Mlddle:	Last:	
Defendant Name:	AARON .		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 XXXXXX4298. 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 XXXXXXX1160 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

·			
Docket Number: CL-14B-22 6	1111100 12 21	TN/LiveScan Number	Complaint/Incident Number FCE210014
The first of the state of the s	irst:	Middle: La	ast:
Defendant Name:	NARON] AI	NDERSON-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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this

My commission expires first Monday of January,

(Signature of Affiant)

71

. Madisterial District dudge

Page _f of _f

COMMONVEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-04 VS. (NAME and ADDRESS): MDJ: Hon, MDJ Sonva McKnight BERRY Address: 1805 North Cameron St AMIR Middle Name First Name Last Name Gen Harrisburg, PA 17103 1539 S 58th St Philadelphia, Pennsylvania 19143 Telephone: (717) 233-3599 NGIC Extradition Code Type વેડિયાલું અને હોલી વિકૃતિનું લેડ્ક (ન અલ્ફર્ C-Misdemeanor Surrounding States 1-Felony Full ☐ 5-Felony Pending Extradition Distance: ☐ 2-Felony Limited 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition ☐ 3-Felony Surrounding States 4-Felony No Extradition □ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Complaint/Incident Number Request Lab Services? Docket Number Date Filed OTN/LiveScan Number ☐ YES 🖾 NO FCE210013 GENDER Co-Defendant(s) ров 09/07 /1992 Add'I DOB POB Middle Name Last Name Gen. Male First Name ☐ Female AKA RACE ⊠ Black ☐ While 🗌 Aslan Native American Unknown Unknown ETHNICITY Hispanic Non-Hispanic RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) GRY (Gray) Hair BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) PNK (Plnk) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) ☐ BLU (Blue) BRO (Brown) GRN (Green) Eye HAZ (Hazel) MAR (Marcon) PNK (Pink) Color MUL (Mullicolored) XXX (Unknown) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO **FBI Number MNU Number** 200 ☐ YES Ft. HEIGHT In. Defendant Fingerprinted ☐ NO Fingerprint Classification: 6 **DEFENDANT VEHICLE INFORMATION** State Registration Comm'l Veh. School Veh. Oth, NCIC Veh, Code Røg. Haz Ind. same as mat Plate# Sticker (MM/YY) Def. 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). Approved via Phone DAG SUZANNE EDWARDS 06/15/2022 (Signature of the attorney for the Commonwealth) (Date) CAM LONG (PSP/MPOETC -Assigned Afflant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 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)

									N.	P (<u>OLI</u>		,		MPLAINT
Docket Nu	ımber: 144-	.22	Date F		P		LiveScar				ļ		aint/incident 10013	Numbe	er
\$15 TW/10 VA	ស្ថិកនឹងស្រា	4750	First:	1/22	,		و روزورو (Iddle:			L	.ast:	FUEZ	10013		
Defendant	Defendant Name: BERRY BERRY														
When the (Set forth a without more The age of the set o	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		itempt 1901 A	ı		citation 02 A	☐ Coi 18 9	nspiracy 903				Nur	nber of V	/ictims Age 60	or Olde	r
I		3922		A2	i or	(Ke	18 PA C	.S.A	1		F3			Γ	
	Offense	 	ection		section		PA Statut			Counts		inade	NCIC Offense		ICR/NIBRS Code
PennE	OT Dat	a S		humber					l Inter	rstate	1		Code Safety Zone		☐ Work Zone
Statute F	olicable Descript	F 1 1			of statute	or ordin	ance). T		-			·	watery EGIO		M 41AIN COIM
Statute L	, ascubi	ion (iii)	uidus ilit	, Haille	o statute	or orall	idiloo). Il	HEER D	, pet		•				
and that th the fraudul	e informa	ation pro cations r	ovided was resulted in pt	false, arbenefit p	nd where the payments of a	Defendan approxima	t certified itely \$63,3! onspiracy	on the a	pplica	tion that	t the	informatio	Age 60 or Olde	s true ar	t qualified to do so d correct, and where
Offens	e 💥 🗎	18 901	' A	18	902 A	18	903								
	2	491	11		.1	of the	18 PA			1	F	-3			
Lead?	Offense#		Section Accid	ent 🌣	Subsection		PA Stat	ule (Tille)		Counts		Grade	NCIC Offense	Code	UCR/NIBRS Code Work Zone
(If a	pplicab	le)	Numl	ber						nterstate			Safety Zone		
document the govern program th	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.														
Inchoa Offens] Atten 18 90			olicitation 1902 A	山 C 10	onspiracy 8 903			Numb	er of	f Victims	Age 60 or Olde	er	
	3	393		/	<u> </u>	of the	18 PA			1		F3	11010 5"	* O : * *	110041122000
Lead?	Offense nDOT D	ata	Section Acct	dent .	Subsection		PA Sla	tute (Title)		Counts		Grade	NCIC Offens ☐ Safety Zone		UCR/NIBRS Code Work Zone
(If a	Statute Description (include the name of statute or ordinance): RECEVING STOLEN PROPERTY														
knowing to	hat It has	s been sl T; Amir E	tolen, or be Berry did ur	elleving t nlawfully	hat it has pro	bably bee lemic Une	en stolen, u Employmen	inless the t Assista	e proc	erty is re	ecely	ed, retain	ied, or disposed	with in	property of another tent to restore it to in the PA Department

Docket Number:	page i nou.	OTN/LiveScap Number	Complaint/Incident Number
CR-149 -32	6/13/32 K3	16397-0	FCE210013
	First:	Middle:	Last:
Defendant Name	AMIR	.	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,
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint 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 that 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 Afflant)

certify that the complaint has been properly completed and verified.

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

(Magisterial District Court Number)

(Issuing Authority)

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-149-22	6/13/22 12	306397-0	FCE210013
THE PROPERTY OF THE PARTY OF TH	First:	Mlddle:	Last:
Defendant Name:	AMIR		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



Docket Number: CR-149-32	Date Flied:	OTN/LiveScan Number	Gomplaint/Incident Number FCE210013	
THE STREET STREET	First:	Middle:	Last:	
Defendant Name:	AMIR		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.



Docket Number: CR-149-22	Date Filed: 0	TN/LiveScan Number	Complaint/Incident Number FCE210013
	First:	Middle:	Last:
Defendant Name:	AMIR		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.



Docket Number: CR-149-22	Date Filed:	OTN/LiveScan Number 06 39 アーク	Complaint/Incident Number FCE210013
	First;	Middle:	Last:
Defendant Name:	AMIR	,	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 COMPLA
Docket Number:	Date Filed:	OTN/LiveScan Num R 306397-	ber Complaint/Incident Number CE210013
Defendant Namei	First; AMIR	Middle:	Last: BERRY
provided by the PA-D		iladelphia, revealed that Bo	erry filed a PUA application which resulted in
nim obtaining \$63,356	,00 in benefits for	which he was not eligible.	The PUA applications and weekly
ertifications specifica	lly state that all in	formation provided must b	e "true and complete." The certification also
equires the applicant	to acknowledge th	at any false statements mad	de on the application is a criminal offense.
Based upon the aforen	nentioned facts, ye	our Affiant respectfully req	uests an arrest warrant be issued for Amir
Berry.			
	GOING AFFIDAVI		EPOSE AND SAY THAT THE FACTS SET T TO THE BEST OF MY KNOWLEDGE,
POLICY OF THE UNI	FIED JUDICIAL SY	STEM OF PENNSYLVANIA	OF THE CASE RECORDS PUBLIC ACCESS THAT REQUIRE FILING CONFIDENTIAL FIDENTIAL INFORMATION AND DOCUMENTS.
			(Signature of Afflant)
Sworn to me and subs	scribed before me tl	nis 15-th day of	TUNE 2022

, Magisterial Diamict

Page S of S

My commission expires first Monday of January,

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: VS. MDJ: Hon. MDJ Sonya McKnight (NAME and ADDRESS): **ANTONIO** VINCENT FORD. Address: 1805 North Cameron St First Name Middle Name Last Name Harrisburg, PA 17103 136 W Wyneva St-Philadelphia, PA 19144 Telephone: (717)233-3599 NCIC Extradition Code Type ☐ C-Misdemeanor Surrounding States 1-Felony Full ☐ 5-Felony Pending Extradition Distance: ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition 2-Felony Limited ☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full □ E-Misdemeanor Pending Extradition F-Misdemeanor Pending Extradition 4-Felony No Extradition ☐ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Request Lab Complaint/Incident Number Date Filed OTN/LiveScan Number **Docket Number** Services? K 306 407 ☐ YES ⊠ NO FCE-21-0019 Co-Defendant(s) ров 05/25/1990 GENDER Add'l DOB Male Middle Name Last Name Gen. First Name ☐ Female AKA RACE White ⊠ Black Native American Unknown Asian Non-Hispanic Unknown PLE (Purple) BRO (Brown) SDY (Sandy) BLU (Blue) GRY (Gray) RED (Red/Aubn.) Hair PNK (Pink) BLK (Black) ONG (Orange) ☐ WHI (White) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLK (Black) BRO (Brown) GRN (Green) GRY (Gray) BLU (Blue) Eye ☐ MAR (Maroon) PNK (Pink) HAZ (Hazel) Color MUL (Multicolored) XXX (Unknown) WEIGHT (lbs.) **DNA Location** DNA ☐ YES ☐ NO FBI Number MNU Number Ft. HEIGHT In. Defendant Fingerprinted ☐ YES ☐ NO Fingerprint Classification: DEFENDANT-VEHICLE INFORMATION Comm'l Veh. School Veh. Oth, NCIC Veh. Code Reg. State Haz Registration Ind. same mat Plate # Sticker (MM/YY) as Def. Style Model Color VIN Year Make 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 06/15/2022 (Name of the attorney for the Commonwealth) e of the attorney for the Commonwe (Date) 797 KATHRYN GRADY (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Police Agency ORI Number) (Identify Department or Agency Represented and Political Subdivision) 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 Harrisburg City with violating the penal laws of the Commonwealth of Pennsylvania at [301] (Place-Political Subdivision) 7,2020 in DAUPHIN County on or about (County Code)



					Sept. P		L COMPLAINT
	t Number		Date Filed:	OTN/LiveScan Nu		Complaint/Inciden	SATE AT HE CANALITATE TO SEE TO SEE HE STATE TO
	-15/	Fir	6 /1/31/22 /	<i>2306 40∓−3</i> Middle:		FCE-21-0019 ast:	
Defen	dant Nam		OINOTV	VINCENT	l.	FORD	
The a	cts comr	mitted by the	accused are descr	ibed below with each A	ct of Assemb	y or statute allegedly vi	olated, if appropriate.
When	there is	more than o	ne offense, each of	fense should be numbe	ered chronolo		,
withou	t more, is r	not sufficient. In	a summary case, you n	nust cite the specific section	(s) and subsection	n(s) of the statute(s) or ordin	ance(s) allegedly violated.
				cluded if known. In addition, d, list only the last four digit		umbers and financial inform § 213.1 – 213.7.)	ation (e.g. Pins) should not
[00/280962505	was as a large state of the same				7		
Inche Offer	SALESCO SUCCESSOR	Attempt 18 901 A	Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Victims Age 60	or Older
\boxtimes	77-	3922		of the 18 PA C.S.A		F3	
	Offense		E A2		Compact of Company Compact Com	NCIC Offense	UCR/NIBRS Code
Lead?	# nnDOT D	Section Nata		PA Statute (Title		Grade Code	
(if	applicab	ole) Accid	dent Number	-	☐ Interstate	☐ Safety Zone	☐ Work Zone
Statu	te Descri	iption (includ	e the name of statu	te or ordinance): THEFT	BY DECEPTIO	V	
Acto	of the co	aucad accas	isted with this Offer	200' In that the Defendant	did intentionally	abtain property of another bu	described by greating a
false in	npression,	including false i	mpressions as to law, va	alue, intention or other state	of mind. TO WI	obtain property of another by F: Antonio Ford intentionally i	filed fraudulent applications
for the	Pandemic	Unemployment	Assistance program thro	ough the PA Department of L	abor and Industr	y website for himself knowing ation that the information pro	g that he was not qualified
				payments of approximately		nuon triat trie iniormation pro	vided was true and correct,

English Control			T	Cananirasu	1		
Inch	oate 📗	Attempt	☐ Solicitation	□ Conspiracy		Number of Victims Age 6	0 or Older
Inche Offe	2000 A CONTRACT	18 901 A	☐ Solicitation 18 902 A	☐ Conspiracy 18 903		Number of Victims Age 6	0 or Older
1000	2000 A CONTRACT	18 901 A				Number of Victims Age 6	0 or Older
Offe	2000 A CONTRACT	18 901 A	18 902 A	18 903		F3 NCIC Offense	
Lead?	nse 2 Offense#	18 901 A 3925 Section Data Accident	18 902 A A Subsection	18 903 of the 18 PA C.S.A	e) Counts	F3 Grade NCIC Offense Code	UCR/NIBRS Code
Offe Lead? Pe	Offense#	18 901 A 3925 Section Data Accide	n Subsection	of the 18 PA C-S A	e) Counts	F3 Grade NCIC Offense Code Safety Zone	
Offe Lead? Pe	Offense#	18 901 A 3925 Section Data Accide	n Subsection	18 903 of the 18 PA C.S.A	e) Counts	F3 Grade NCIC Offense Code Safety Zone	UCR/NIBRS Code
Lead? Pe (ii) Statu	Offense# ennDOT C applicat te Descr	3925 Section Data Accidite Ciption (included	n Subsection dent Number. de the name of statu	of the 18 PA C.S.A PA Statute (Title ute or ordinance): RECE:	e) Counts Interstate IVING STOLEN is guilty of theft	Grade NCIC Offense Code Safety Zone PROPERTY If he intentionally receives, re	UCR/NIBRS Code Work Zone etains, or disposes of
Lead? Pe (ii) Statu Acts	Offense# ennDOT C applicat te Descr of the acole property	3925 Section Data Die) Accipition (included coursed assocy of another known associated a	n Subsection dent Number. de the name of statue or statue with this Offer owing that it has been statue and the statue of the statue or statue o	of the 18 PA C.S.A PA Statute (Title ute or ordinance): RECE nse: In that the Defendant, colen, or believing that it has	e) Counts Interstate IVING STOLEN is guilty of theft probably been st	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, reolen, unless the property is not considered.	UCR/NIBRS Code Work Zone etains, or disposes of eceived, retained, or
Lead? Pe (ii) Statu Acts movat dispos	Offense# comport of the acole property and with interest and the acole property and with interest and the acole with interest and the acole property and with interest and the acole property acole proper	3925 Section Data Die) Accipition (included assocy of another known that to restore it	n Subsection dent Number. de the name of statue with this Offer owing that it has been statue to the owner. TO WIT:	of the 18 PA C.S.A PA Statute (Title ute or ordinance): RECE nse: In that the Defendant, colen, or believing that it has	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploym	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, report of the code, unless the property is ment Assistance benefits for his	UCR/NIBRS Code Work Zone etains, or disposes of
Lead? Pe (ii) Statu Acts movat dispos	Offense# comport of the acole property and with interest and the acole property and with interest and the acole with interest and the acole property and with interest and the acole property acole proper	3925 Section Data Die) Accipition (included assocy of another known that to restore it	n Subsection dent Number. de the name of statue with this Offer owing that it has been statue to the owner. TO WIT:	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: nse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploym	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, report of the code, unless the property is ment Assistance benefits for his	UCR/NIBRS Code Work Zone etains, or disposes of eceived, retained, or
Lead? Pe (ii) Statu Acts movat dispos	Offense# comport of the acole property and with interest and the acole property and with interest and the acole with interest and the acole property and with interest and the acole property acole proper	3925 Section Data Die) Accipition (included assocy of another known that to restore it	n Subsection dent Number. de the name of statue with this Offer owing that it has been statue to the owner. TO WIT:	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: nse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploym	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, report of the code, unless the property is ment Assistance benefits for his	UCR/NIBRS Code Work Zone etains, or disposes of eceived, retained, or
Lead? Pe (ii) Statu Acts movat dispos	Offense# comport of the acole property and with interest and the acole property and with interest and the acole with interest and the acole property and with interest and the acole property acole proper	3925 Section Data Die) Accipition (included assocy of another known that to restore it	n Subsection dent Number. de the name of statue with this Offer owing that it has been statue to the owner. TO WIT:	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: nse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploym	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, report of the code, unless the property is ment Assistance benefits for his	UCR/NIBRS Code Work Zone etains, or disposes of eceived, retained, or
Lead? Pei (ii) Statu Acts movat disposifrom t	Offense# Off	3925 Section Data Die) Accipition (included assocy of another known that to restore it	n Subsection dent Number. de the name of statue with this Offer owing that it has been statue to the owner. TO WIT:	of the 18 PA C.S.A PA Statute (Title ute or ordinance): RECE nse: In that the Defendant, tolen, or believing that it has a Antonio Ford filed for Pande City of Philadelphia, knowing	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, report of the code, unless the property is ment Assistance benefits for his	UCR/NIBRS Code Work Zone etains, or disposes of eceived, retained, or mself and received the funds
Lead? Pei (ii) Statu Acts movat dispos from t	Offense# Off	3925 Section Data Die) Accidete Coused assocy of another known to restore it program while for the section of t	n Subsection dent Number de the name of statu clated with this Offe bying that it has been st to the owner. TO WIT fully employed with the offer of the owner. Solicitation 18 902 A	18 903 Of the 18 PA C.S.A PA Statute (Title or ordinance): RECE Inse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande City of Philadelphia, knowing 18 903	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. er of Victims Age 60 or Old	UCR/NIBRS Code Work Zone etains, or disposes of eceived, retained, or mself and received the funds
Lead? Pe (ii) Statu Acts movat dispos from t	Offense# Import E Import applicate the Description of the accepted with interest with interest and the benefit applications.	18 901 A Section Data Coused assocy of another known the program while for the program	n Subsection dent Number le the name of statue of the owner. To with the owner with the owner with the owner with the owner are owner. To with the owner w	The second state of the second	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploym he did not qualif	Grade NCIC Offense Code Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. Er of Victims Age 60 or Old F3	UCR/NIBRS Code Work Zone Petains, or disposes of eceived, retained, or mself and received the funds
Lead? Per (ii) Statu Acts moval disposition to Off	Offense# PennDOT C Tapplicate te Descripte of the accepte with interest of the benefit hoate ense 3 PennDOT C	3925 Section Data Accionate Accionat	n Subsection dent Number de the name of statue of the st	The second state of the second	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploym he did not qualif Numbre R. 1 itle) Counts	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is rent Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is rent Assistance benefits for his y for such benefits.	UCR/NIBRS Code Work Zone etains, or disposes of eccived, retained, or mself and received the funds
Lead? Per (ii) Statu Acts moval disposition to Offi	Offense# PennDOT C Tapplicate te Descr of the acole property and with interest the benefit hoate ense 3 PennDOT (If applicate the property of the property o	3925 Section Data Section Data Coused assocy of another known to restore it program while f Attempt 18 901 A 4911 Set Sec Data able)	n Subsection dent Number de the name of statue of statue with this Offer owing that it has been statue to the owner. To WIT: fully employed with the description of the subsection of the subs	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: ute or ordinance): RECE: nse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande City of Philadelphia, knowing 18 903 of the 18 PA C.S. PA Statute (T	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif Number Number	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is rent Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is rent Assistance benefits for his y for such benefits.	UCR/NIBRS Code Work Zone etains, or disposes of eccived, retained, or mself and received the funds
Lead? Per (ii) Statu Acts moval disposition to Offi	Offense# PennDOT C Tapplicate te Descr of the acole property and with interest the benefit hoate ense 3 PennDOT (If applicate the property of the property o	3925 Section Data Section Data Coused assocy of another known to restore it program while f Attempt 18 901 A 4911 Set Sec Data able)	n Subsection dent Number de the name of statue of statue with this Offer owing that it has been statue to the owner. To WIT: fully employed with the description of the subsection of the subs	The second state of the second	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif Number Number	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is rent Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is rent Assistance benefits for his y for such benefits.	UCR/NIBRS Code Work Zone etains, or disposes of eccived, retained, or mself and received the funds
Lead? Per (ii) Statu Acts movat disposifrom to	Offense# InnDOT If InnDOT INDOT InnDOT INDOT IND	3925 Section Data Die) Accioniption (included associated associate	n Subsection dent Number: de the name of statu clated with this Offer bying that it has been statu to the owner. TO WIT fully employed with the offer Solicitation 18 902 A A1 Stion Subsection Accident Number ————————————————————————————————————	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: Inse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande City of Philadelphia, knowing 18 903 of the 18 PA C.S. PA Statute (Title or ordinance): TAMP	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif Numb A. 1 Itle) Counts	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits.	UCR/NIBRS Code Work Zone Petains, or disposes of eccived, retained, or miself and received the funds Work Zone Detains, or disposes of eccived, retained, or miself and received the funds Detains, or disposes of eccived, retained, or miself and received the funds Detains, or disposes of eccived, retained, or miself and received the funds
Lead? Per (ii) Statu Acts movat disposition to the control of the	Offense# InnDOT I I applicate the Description of the according to the benefit of the benefit of the benefit of the according to the according	3925 Section Data Die) Accioniption (included associated associ	In Subsection Ident Number: Ide the name of statue of statue of the owner. To WIT fully employed with the owner of statue of the owner	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: Inse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande City of Philadelphia, knowing 18 903 of the 18 PA C.S. PA Statute (Title or ordinance): TAMP Inse: In that the Defendant the government for Informate	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif Numb Itle) Counts Interstate ERING WITH F	Grade NCIC Offense Code Grade Safety Zone PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits. PROPERTY If he intentionally receives, recolen, unless the property is ment Assistance benefits for his y for such benefits.	UCR/NIBRS Code Work Zone Petains, or disposes of eccived, retained, or miself and received the funds Detains of disposes of eccived, retained, or miself and received the funds Detains of Work Zone Detains of Work Zone Aution of, any record, retained of
Lead? Per (ii) Statu Acts movat disposition to the document of the document	Offense# InnDOT If InnDOT	3925 Section Data Die) Accipition (included associated	In Subsection Ident Number: Ide the name of statue of statue of the owner. To WIT fully employed with the owner of statue of the owner	of the 18 PA C.S.A PA Statute (Title or ordinance): RECE: Inse: In that the Defendant, colen, or believing that it has a Antonio Ford filed for Pande City of Philadelphia, knowing 18 903 of the 18 PA C.S. PA Statute (Title or ordinance): TAMP Inse: In that the Defendant the government for Informaticals or fraudulent informaticals.	e) Counts Interstate IVING STOLEN is guilty of theft probably been stemic Unemploymhe did not qualif Numb Itle) Counts Interstate ERING WITH F	Grade NCIC Offense Code Safety Zone	UCR/NIBRS Code Work Zone Petains, or disposes of eccived, retained, or miself and received the funds Detains of disposes of eccived, retained, or miself and received the funds Detains of Work Zone Detains of Work Zone Aution of, any record, retained of

Page 1 of 3 AOPC 412A - Rev. 7/18



Docket Number:	Date Filed: O	TN/LiveScan Number	Complaint/Incident Number
CR-151-10	6/13/22 /3	06407-3	FCE-21-0019
	First:	Middle:	Last:
Defendant Name:	ANTONIO	VINCENT	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.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{\cancel{U}}$.
- 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 that 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.)

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

(Magisterial District Court Number)

(Issuing Authority)

Docket Number:

CL-151-22 | 13122 | R 306 407 | FCE-21-0019

Defendant Name: ANTONIO | VINCENT | 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.



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



Docket Number:	Date Filed:	OTN/LiveŞcan Number	Complaint/Incident Number
CR-151-22	6/13/22 13	06407-3	FCE-21-0019
	First:	Middle:	Last:
Defendant Name:	ANTONIO	VINCENT	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



Docket Number:	Date Filed:	, OTN/LiveŞcan Number	Complaint/Incident Number
CR-151-22	6/13/22 1	306407-3	FCE-21-0019
	First:	Middle:	Last:
Defendant Name:	ANTONIO	VINCENT	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.



Docket Number:

CL-151- 32

Use Filed:

OTN/LiveScan Number

FCE-21-0019

First:
ANTONIO

Defendant Name:

Date Filed:

OTN/LiveScan Number

FCE-21-0019

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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this

day o

TUNE

(Signature of

Affiant)

3022



	. K. of ##\#\ a.	I OFICE CIVINITIAL COMILECTIVI
Docket Number: Date Filed:	OTN/LiveScan Number	Complaint/Incident Number FCE-21-0019
Defendant Name: First: ANTONIO	Middle: VINCENT	Last: FORD
6/15/22 Date	January,	, Magisterial Districts (rege

COMMONWEALTH OF PENNSYLVANIA						POLICE CRIMINAL COMPLAINT COMMONWEALTH OF PENNSYLVANIA					
COUNTY OF: DAUPHIN Magisterial District Number: 12-2-04				n C	ОММОН			NSYLVAN	IIA		
_			2-04		DEFEND	<u>}</u> * N. N. 1™".			S.	~ ~\	
MDJ: Hon. S			CL 1	t =t = 1=	DEFENDA	-		(NAME an		88):	
Address: 18	US NOR	n Camero	on St., r	arrisburg,	CHRISTOF First Name	'TEK	 Middle	Name	DAYE Last Nar	ma	Gen
PA 17103									·	HO	Gen
Telephone:						·	PHILADELF	·			
☑ 1-Felony F	的 強烈	新_数_章		elony Pending	NCIC Extradition	Code Type	demeanor Surr	Aundina Cia			
2-Felony L				, -	Extradition Determ.		demeanor No E	_	les	☐ Distance:	
3-Felony S		n States		Misdemeanor F			demeanor Pend		ion		
4-Felony		-		Misdemeanor L			demeanor Pend				
1 41 Cioliy I	· 學家 · 家里 ·	505 1 557_144	- Your - Ward		NDANT IDENTIFICA				1. 大型 5. 元章 5. 元	i inggaraga	Mr. 5.4 (\$4 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Docket Numl	2	1: -20 - 30 - 7. 	Date Filed		LiveScan Number		olaint Number		Number	Request Lab	Section 2. Especial description
CR-14	45-6	22 0	6UA	22 1	30626B		E-210269	BCE 2	10269	☐ YES	⊠ NO
GENDER	DOB	4/06/197	78	РОВ			Add'l DOB	/ /		Co-Defendar	nt(s)
⊠ Male		First Nar	ne		Middle Na	ime	1	Last Name			Gen.
☐ Female	AKA	ı									
RACE	<u> </u>			Asian		⊠ Black		Native Americ	an	Unknown	
ETHNICITY	GRY (Gray)	ispanic	(Red/Aubn	Non-His ☐	panic . SDY (Sandy)	Unknown BLU (Blue	\	(Purple)		BRO (Brow	
Hair						•					
COIDI	BLK (Black) BLN (Bloods	ONC [] Strawberry)	(Orange)		WHI (White)	XXX (Unk.	/Baid) ∐ GRI	V (Green)		PNK (Pink)	
	BLK (Black)		☐ BLU	I (Plus)	⊠ BRO (Brown)	Па	RN (Green)		Па	RY (Gray)	
/ -	HAZ (Hazel)			R (Maroon)	PNK (Pink)		IUL (Mujticolored))		XX (Unknown)	
DNA	<u> </u>	☐ YES		DNA Location	·		(,	<u> </u>		WEIGHT	(lbs.)
FBI Number		1233050		·	U Number						
Defendant F	ingerprint	ed 🔲	YES 🗌	NÓ						Ft. HEI	GHT In.
Fingerprint (Classifica	tion:								6	1
					EFENDANT VEHICL			ol Veh. 🔲	Ott. NO	D.Val. Anda	
Plate #		State	Haz mat	Sticker (M	istration IM/YY) /	Comm'l V Ind.	_ 1	y veii. 🗀	Ott. NCR	C Veh. Code	Reg. same as Def,
VIN		-	, ц	Year Ma	ike	Model		Style		Color	
Office of the	ne attorn	ey for the	Commo	nwealth 🔯 /	Approved ☐ Dis	approved	because:				
(The attorner	(for the C		h may redi	ilre that the cor	nplaint, arrest warrar	nt affidavit nr	both be approv	ed by the at	torney for t	ne Commonwe	alth prior to
filing, See P			ii iiiay ioqi	and that the doi	ripiani, anost nonai	it uniduris, or	boşii so appiot	ou by the u			all prior to
DAG MATI	ICDIAIC A	400E0440						101200		,	,
DAG KATH (Name of the a					Opproved e	」(eで十个ない。 attorney for the	CONTRACTOR	(1/20 E)	2		<u>/</u>
(Marile of the c					(4.5.1			,	·		(Date)
I, SA TAI	RYN LII	EBTAG					GE #812				
	the Affian					(1	PSP/MPOETC	-Assigned A	ffiant ID Nu	mber & Badge	#
of Pe	nnsvlv	ania Offi	ce of A	ttorney Ge	neral		PA022240				
(Identify I	Departmen	t or Agency : (check a	Represent	ed and Political	Subdivision)		Police Agency (ORI Number)		
1	•	-		•	lives at the add	ress set for	th above				
					known to me but						
ПІз	crise th	a defenda	nt whose	name and	popular designat	inn or nick	name are ur	iknown to	me and v	whom I have	<u> </u>
ther	efore de	signated a	as John I	Doe or Jane	Doe			u	AND LINE V	THE STATE OF THE S	•
	violating	the pena	l laws of		nwealth of Penns	sylvania at	[301] (Subdivision C	PA Dode) (Pla	ept Of La ce-Political	bor And Ind Subdivision)	lustry, 651
		County		221	nn or ab	out JUNF	2020 TO S	EPTEMBE	R 2021		
1 511 62	: 1211	. Journey	,	(County Codo)							

							ę		OLIC	CEC	RIMINAL	CO	MPLAINT
Docket I			Date Filed	i: 22		N/LiveScan I		•			aint/Incident N 210269	umbe	r
1841 1871 1		14073	First:			<i>6268</i> Middle:	/_	L		DCE-	210209		
Defenda	int Nam		CHRISTO	PHER		L			DAYE		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
When the control of t	here is a brief so nore, is no of the vict if the ide	more than Immary of the ot sufficient. Im at the time	one offens he facts suffic In a summar ne of the offer	se, each c clent to advi y case, you ise may be i	offense sho se the defend must cite the included if kn	ould be num	bered ure of the on(s) and on, socia	chronolo offense(s) I subsection I security n	gically) charge on(s) of numbers	the states and fire	allegedly viola tation to the statu tute(s) or ordinand nancial information.	te(s) a ce(s) a	llegedly violated.
Inchoal Offens	Parket P.	Attempt 18 901 A	. —	Solicitation 8 902 A		onspiracy 903			Numt	er of V	ictims Age 60 or	Older	
	1	3922	م	\3	of the	TITLE 18		1	F3	Ī			
Lead?	Offense #	Sec	ion	Subsection	(Heaters, Southern Sales)	PA Statute (Title)	Counts	Gra	de	NCIC Offense Code	U	CR/NIBRS Code
	DOT D		cident Numb	er-				iterstate			Safety Zone		☐ Work Zone
(if a		e)			ute or ordi	nance): THE			N.			<u> </u>	
of Penns that he w	ylvanía De vas no lon	epartment of ger employed	F Labor and Ined by the City	ndustry Pano of Philadelp Solicitation	demic Unemp ohia Streets I	oloyment Assist Department and Department and Department Assistance	ance (Pl	JA) Funds t	oy creat loymen	ing and t.	er Daye applled for i repeatedly reinfo	ercing t	eceived \$42,860.00 the false impression
Offen	se	18 901 A		18 902 A	1 1	8 903					-		
	2	3925		A	of the	TITLE 18		1	F3				
Lead?	Offense InDOT I		ection Accident	Subsection	n	PA Statute		Counts Interstate		irade r	NCIC Offense C Safety Zone	ode	UCR/NIBRS Code Work Zone
			Number	me of stat	tute or ordi	nanca): BEC					_ Calcty Zolle		T AACIK SOILE
the Penn	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.												
- Incho Offer	iate 18¢ ≢	18 901 A		Solicitatio 18 902 A		Conspiracy 8 903		Numb	er of V	ictims .	Age 60 or Older		
	3	4911		A1	, of the	a		1	F3				
Lead?	Offens nnDOT	e# S Data 5	Section Accident	Subsectio	n .	PA Statute	l	Counts	***************************************	Grade r	NCIC Offense C	ođe	UCR/NIBRS Code
想,《lif	applica	ble)	Number		tute or ord	inance): TAN		Interstate G WITH P			_] Safety Zone		☐ Work Zone
record, c	iocument	or thing bel	onging to, or	received or	kept by, the	government fo	r Informa	ation or rec	ord, or	require	a false entry in, or d by law to be ke lications he submi	pt by c	alteration of, any others for

		*	
Docket Number:	Daţe Filed:	OTN/LiveScan Number	Complaint/Incident Number
CL-145-22	6/13/32	1306268-4	BCE-210269
能。第2是,例如是,例如表	First:	Middle:	Last:
Defendant Name:	CHRISTOPHER	L	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.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{3}$.
- 5. I certify that this filing comptles 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.

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

1./10/2022

(Signature of Affiant)

AND NOW, on this date

JUNE 15,200

I certify that the complaint has been properly completed and verified.

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

(Magisterial District Court Number)

(Issuing Authority)

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number	
CR-145-22	6/13/22	K306265- +	BCE-210269	
育。李、孙、芳、寿、秦、薨	First:	Middle:	Last:	
Defendant Name:	CHRISTOPHER	L	DAYE	

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Taryn Liebtag, #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."



Docket Number: Date Filed; CR-145-22 06113122	R 306 368 - 4	Complaint/Incident Number BCE-210269	
三定量的表现是一些 First:	Middle:	Last:	
Defendant Name: CHRISTOPHER	L	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 XXXXXX0572, 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 XXXXXX6848 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



Docket Number: CR-145-32	Date Filed:	R 306	Scan Number		Complaint/Incident Number BCE-210269
表表演的表示	First:	Middl	e: '	Last:	
Defendant Name:	CHRISTOPHER	L		DAY	

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.

Docket Number:	Date Filed: 06/13/32	R 306268-4	Complaint/Incident Number BCE-210269
	First:	Middle:	Last:
Defendant Name:	CHRISTOPHER	L	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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Sworn to me and subscribed before me this 15 1/1 day of 1002 2

My commission expires first Monday of January, 2028

(Signature of Affiant)

(Signature of Affiant)

(Signature of Affiant)

(All 10/22

(Signature of Affiant)

4.4	
//	
/	
71	
11	
_	

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN COMMONWEALTH OF PENNSYLVANIA Magisterial District Number: 12-2-04 VS. (NAME and ADDRESS): MDJ: Hon, Sonya McKnight Address: 1805 N Cameron Street DERRICK SMITH First Name Middle Name Lest Name Gen Harrisburg, PA 17103 435 E. Penn St, Philadelphia, PA 19144 Telephone: (717)233-3599 NCIC Extradition Code Type □ 1-Felony Full ☐ 5-Felony Pending Extradition C-Misdemeanor Surrounding States ☐ Distance: 6-Felony Pending Extradition Determ. □ D-Misdemeanor No Extradition 2-Felony Limited 3-Felony Surrounding States A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition F-Misdemeanor Pending Extradition ☐ 4-Felony No Extradition ■ B-Misdemeanor Limited DEFENDANT IDENTIFICATION INFORMATION Docket Number Complaint/Incident Number Request Lab Services? OTN/LiveScan Number YES NO 6/13/22 30641.3 BCE-210272 ров Pennsylvania Co-Defendant(s) GENDER DOB 05/23/1982 Add'l DOB Last Name Gen. First Name Middle Name ☐ Male ☐ Female **AKA** ☐ While ☐ Hispanio X Black RACE Native American Unknown Asian ETHNICITY Non-Hispanic ☐ Unknown RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown) GRY (Gray) Hair PNK (Plnk) WHI (White) XXX (Unk./Bald) GRN (Green) BLK (Black) ONG (Orange) Color BLN (Blonde / Strawberry) GRY (Gray) BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) Eye Color ☐ HAZ (Hazel) MAR (Maroon) PNK (Plnk) XXX (Unknown) MUL (Multicolored) **DNA Location** WEIGHT (lbs.) DNA ☐ YES ☐ NO **FBI Number** 200 MNÚ Number 511249XB9 · ☐ YES ☐ NO Ft. HEIGHT In. Defendant Fingerprinted Fingerprint Classification: DEFENDANT VEHICLE INFORMATION Oth, NCIC Veh. Code Registration Comm'l Veh. School Veh. Reg. Haz mat Ind. 🔲 same as Plate # Sticker (MM/YY) Def. Make leboM Style Color VIN Year Office of the attorney for the Commonwealth Approved Disapproved because: (The altorney 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 Electrosicalle (Name of the attorney for the Commonwealth) gnature of the attorney for the Commonwea I, SA MARK BATES # 790 (PSP/MPOETC -Assigned Affiant ID Number & Badge # (Name of the Affiant) PA0222400 Pennsylvania Office of Attorney General (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number) do hereby state: (check appropriate box) 1. X 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 Pa Dept Of Labor And Industry, 651 (Place-Political Subdivision) with violating the penal laws of the Commonwealth of Pennsylvania at [301] Boas St, Harrisburg, Pa in DAUPHIN County [22] on or about JUNE OF 2020 TO SEPTEMBER OF 2020 (County Code)

				ICE CRIMINAL	
Docket Number:	Date Filed:	OTN/LiveScan Num	per	Complaint/Incident No	ımber
CR-151-22	6/13/32 First:	<u>/<3064/3~ス</u> Middle:	Las	BCE-210272	
Defendant Name:	DERRICK	M	4	тн	
	1	* ·			-
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. PINe) 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 Attempt Offense 18 901 A	☐ Solicitation 18 902 A	Conspiracy 18 903	N	umber of Victims Age 60 or	Older
☑ 1 3922	A2	of the TITLE 18	1 F.		
Offense	A3			NCIC Offense	•
Lead? # 5	ection Subsection	PA Statute (Title)	Counts	Grade Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	_ [Interstate	☐ Safety Zone	☐ Work Zone
	clude the name of state	ite or ordinance): THEFT B	Y DECEPTION		L
		a.			
reinforced, or which the dec	elver knows to be influencing	☐ Conspiracy	,	f Victims Age 60 or Older	
Offense 18 901	I A 18 902 A	18 903			
□ 2 392	25 A	ortio TITLE 18	1	F3	
Lead? Offenso#	Section Subsection	PA Statute (Title)	Counts	Grade NCIC Offense Co	ode UCR/NIBRS Code
PennDOT Data	Accident		☐ Interstate	☐ Safety Zone	☐ Work Zone
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 : Atten Offense : 18 90		Conspiracy 18 903	Number	of Victims Age 60 or Older	· ,
☐ 3 49:		or the TITLE 18	1	F3	
Lead? Offense# PennDOT Data	Section Subsection Accident	n PA Statute (Title		Grade NCIC Offense C	
(If applicable) Number — Dinterstate Safety Zone Work Zone Statute Description (include the name of statute or ordinance); TAMPERING WITH PUBLIC RECORDS OR INFORMATION					
Department of Labor and I	ndustry to receive funds, nar	nse: The Defendant did know nely: Pandemic Unemployment to be kept by others for inform	Assistance (PUA)	Funds in the amount of \$17,9	the Pennsylvania 60,00 knowing the

Docket Number:	Date Filed: 0 6/1/1/22 R 30	TN/LiveScan Number		Complaint/Incident Number BCE-210272
Defendant Name:	First: DERRICK	Middle:	Last: SMIT	
·	DEKKICK	*	SHIT	П

- 1 ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and bellef. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{}$.
- 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 that 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)

(Date)

(Signature of Afflant)

AND NOW, on this date

(Date)

(Signature of Afflant)

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

(Magisterial District Court Number)

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CL-152-22	6/13/22	R306413-2	BCE-210272
	First:	Middle:	Last:
Defendant Name:	DERRICK	. M	SMITH

AFFIDAVIT of PROBABLE CAUSE

AFFIANT'S BACKGROUND

Your Afflant is Mark D. Bates, a Special Agent with the Pennsylvania Office of the Attorney General, Bureau of Criminal Investigations. Your Afflant 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 Afflant'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 Afflant has thirty-two years of law enforcement experience and prior to my employment with the Office of Attorney General, your Afflant was a Detective for twenty-six of those years with the Cheltenham Township Police Department, Montgomery County, Pennsylvania. During the course of your Afflant's law enforcement career, your Afflant 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.

FRAUDLENT 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.

榔	POLICE	CRIMINAL	COMPL	AIN1
		AT MILLION IN	O O I III I	

Docket Number:	Date Filed: O	TN/LiveScan Number	Complaint/incident Number BCE-210272
Defendant blomes	First:	Middle:	Last:
Defendant Name:	DERRICK	M	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, Sulte, 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, Sulte 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:

		freeze c c c c c c c c c c c c c c c c c c			
			1	•	
	Card ID	U.S. Bank: ACH from Known Remitter	į	ì	
	3835797956	Remitter: COMM OF PA UCD (1031301024) UCBENEFITS - Payee: DERRICK SMITH - SEC: PPD	7/15/2020	\$3,000	
	3835797956	Remitter: COMM OF PA UCD [1031301024] UCBENEFITS - Payee: DERRICK SMITH - SEC: PPD	7/15/2020	\$2,240.00	
1	•				
	***	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

	POI	ICF	CRIMI	ΝΔΙ	COM	iPi A	MIL
1-4664	FUL		CRIIVII	INAL		IFĿ∦	- 111 V I

Docket Number: CK-152- 22	Date Filed:	OTN/LiveScan Number 306 4/3-2	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.

5/1 Mel Boto #790

(Signature of Affiant)

Sworn to me and subscribed before me this

1

My commission expires first Monday of January,

COMMONWEALTH OF PENNSYLVANIA POLICE CRIMINAL COMPLAINT COUNTY OF: DAUPHIN **COMMONWEALTH OF PENNSYLVANIA** Magisterial District Number: VS. DEFENDANT: (NAME and ADDRESS): MDJ: Hon. MDJ Sonya McKnight Address: 1805 North Cameron St J'MAR MAURICE **HENDERSON** First Name Middle Name Last-Name Harrisburg, PA 17103 927 Bridge Street Philadelphia, PA 19124 Telephone: (717)233-3599 NCIG Extradition Code Type □ 1-Felony Full 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: □ D-Misdemeanor No Extradition 2-Felony Limited 6-Felony Pending Extradition Determ. ☐ 3-Felony Surrounding States ☐ E-Misdemeanor Pending Extradition ☐ A-Misdemeanor Full 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition DEFENDANT IDENTIFICATION INFORMATION Request Lab **Date Filed** OTN/LiveScan Number **Docket Number** Complaint/Incident Number Services? 306 402 ☐ YES ⊠ NO 06/15/2022 FCE-21-0018 GENDER ров 07/30/1977 Co-Defendant(s) Add'l DOB Male Male First Name Middle Name Last Name Gen. ☐ Female ⊠ Black RACE □ White Unknown ☐ Asian ☐ Native American Non-Hispanic ETHNICITY Hispanic Unknown BRO (Brown) GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) Hair ☐ WHI (White) PNK (Pink) BLK (Black) ONG (Orange) XXX (Unk./Bald) GRN (Green) Color BLN (Blonde / Strawberry) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray) BLK (Black) Eve ☐ HAZ (Hazel) MAR (Maroon) PNK (Pink) Color ☐ MUL (Multicolored) XXX (Unknown) **DNA** Location WEIGHT (lbs.) DNA ☐ YES ☐ NO FBI Number MNU Number Defendant Fingerprinted Ft. HEIGHT In. ☐ YES ☐ NO Fingerprint Classification: DEFENDANT VEHICLE INFORMATION School Veh. Oth, NCIC Veh. Code State Haz Registration Comm'l Veh. Reg. Ind. mat same Plate # Sticker (MM/YY) as Def. \Box VIN Year Make Model Style Color Office of the attorney for the Commonwealth \(\Delta \) Approved \(\Delta \) 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 06/15/2022 fature of the attorney for the Commonwealth) (Name of the attorney for the Commonwealth) (Date) KATHRYN GRADY (Name of the Affiant) (PSP/MPOETC -Assigned Affiant ID Number & Badge # 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 JUNC 7, 2000 in DAUPHIN County [22] on or about (County Code)



								. – –	- · · · · · · · · · · · · · · · · · · ·	COMPLAINT
Docket N		Date F	Filed: 47	OTN	/LiveScan N	umber		Com	plaint/Incident N	lumber
CK-15	50 - 2 2	616	11 72 K	306	402-	5		FCE	-21-0018	
Defendan	it Name:	First: J'MAR		1	liddle: 1AURICE		Last: HEN	DERS	ON	
				<u></u>	" TOTALOE		11614			
The acte	committed by	the accu	and are denori	had halau	with analy (hat of Annam	ably or	ototut	o ollogodiu viole	ated, if appropriate.
	ere is more tha								e allegediy viola	ateu, ii appropriate.
(Set forth a	brief summary of	the facts s	sufficient to advise	the defenda	int of the natur	e of the offense	e(s) chai	rged. A	citation to the statu	ite(s) allegedly violated,
without mo	re, is not sufficier	ւt. In a sum	imary case, you m	ust cite the s	specific section	(s) and subsec	tion(s)	of the si	atute(s) or ordinand	ce(s) allegedly violated.
The age of he listed. If	the victim at the ti f the identity of an	me of the account m	offense may be inc	cluded if kno I list only th	wn. In addition e last four digit	, social security	y numbe • 88 213	ers and 1 – 213	financial informatio	on (e.g. PINs) should not
20 1101001 11	the defined of an	4000411111	and no odtabilation	2, NOC OILLY 151	o iast ioar aign	0. 204 1 A.00ut	23 2.10	71 - 210		
Inchoate	☐ Attempt		☐ Solicitation	ПС	nspiracy	7	F			
Offense			18 902 A	18 9			Nur	nper of	Victims Age 60 or	r Older
Company of the Compan		-1	7							
	3922		A2	of the	l8 PA C.S.A	\. 1	F3			
Lead?	Offense Se	ection	Subsection		PA Statute (Titl	e) Counts	6	Grade	NCIC Offense	UCR/NIBRS Code
	# OOT Data	.00011	- Capaconon		TA Glatate (Til	e) Counts			Code	OCIVIDA Code
CONTRACTOR	plicable)	Accident N	umber			☐ interstate	İ		Safety Zone	☐ Work Zone
	Description (inc	lude the	name of statut	te or ordin	ance): THEF	RY DECEPTI	ON.			
Otatato E	2000117110117(1110	nado trio	marino or otata	to or ordin	anoch mier	DI BECÉ: 12	.014			
A - (F II		t - t ī								
ACTS OF THE	ne accused ass	sociated	with this Offen	Se: In that i	the Defendant	did intentionally	y obtain	propert	y of another by dec	ception by creating a
raise impre	SSION, INClUDING TO a for the Pandemic	ise impress	SIONS as to law, va	iue, intentior	or other state	or mind. TO V	MII: J'M	iar Hend	lerson intentionally	filed fraudulent If knowing that he was
not qualifie	ed to do so and the	at the infor	mation provided w	as false, and	l where the De	fendant certifie	d on the	muusu annlica	y website for nimse ation that the Inform	nation provided was true
	t, and where the fi							о оррпс	adori dide did ililorii	·
						• • • • • • • • • • • • • • • • • • • •	•			
									•	
Inchoate	Al □ Attempt	1	☐ Solicitation	Псо	nentracy				````	. 011
Inchoate Offense	22731		☐ Solicitation	☐ Coi	nspiracy 903		Nur	mber of	Victims Age 60 or	r Older
							Nur	mber of	Victims Age 60 o	r Older
				18 9	903	1 1 =	cev vegorián	ogeweensk	Victims Age 60 or	r Older
Offense	18 901 A 	and the second s	18 902 A	18 9	903 18 PA C.S.	STATE OF THE STATE	F3		Victims Age 60 or	
Offense D 2 Lead? 0	18 901 A 3925 Iffense# Se	ection		18 9	903	STATE OF THE STATE	F3	ogeweensk		UCR/NIBRS Code
Offense 2 Lead? O Penni	3925 Iffense# Se	ection Accident N	18 902 A Subsection	18 9	903 18 PA C.S.	STATE OF THE STATE	F3	Grade	NCIC Offense	
Offense 2 Lead? 0 Penni (if ap	3925 3925 3925 3925 3925 3925 3925 3925 3925	Accident N	18 902 A Subsection	of the	18 PA C.S./ PA Statute (Tit	le) Counts	F3	Grade	NCIC Offense Code	UCR/NIBRS Code
Offense 2 Lead? 0 Penni (if ap	3925 Iffense# Se	Accident N	18 902 A Subsection	of the	18 PA C.S./ PA Statute (Tit	le) Counts	F3	Grade	NCIC Offense Code	UCR/NIBRS Code
Offense 2 Lead? 0 Penni (if ap	3925 3925 3925 3925 3925 3925 3925 3925 3925	Accident N	18 902 A Subsection	of the	18 PA C.S./ PA Statute (Tit	le) Counts	F3	Grade	NCIC Offense Code	UCR/NIBRS Code
Offense 2 Lead? O Penni (if ap Statute I	3925 Iffense# Se DOT Data plicable) Description (inc	Accident N clude the	Subsection umber name of statu	of the te or ordin	18 PA C.S./ PA Statute (Tit ance): RECE	le) Counts Interstate	F3	Grade	NCIC Offense Code Safety Zone	UCR/NIBRS Code
Offense 2 Lead? O PennI (if ap Statute I Acts of ti movable p	3925 Iffense# Se DOT Data plicable) Description (income accused as roperty of another	Accident N clude the sociated	Subsection umbers name of statu with this Offenhat it has been sto	of the te or ordin	PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been	N PROI	Grade PERTY Intentior unless I	NCIC Offense Code Safety Zone nally receives, retain	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable p disposed w	3925 Iffense# Se DOT Data plicable) Description (income accused as roperty of another with Intent to restore	Accident N clude the sociated knowing t re it to the	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the le or ordin	PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemp	N PROI	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his	UCR/NIBRS Code Work Zone is, or disposes of
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable p disposed w	3925 Iffense# Se DOT Data plicable) Description (income accused as roperty of another	Accident N clude the sociated knowing t re it to the	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the le or ordin	PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemp	N PROI	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable p disposed w	3925 Iffense# Se DOT Data plicable) Description (income accused as roperty of another with Intent to restore	Accident N clude the sociated knowing t re it to the	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the le or ordin	PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemp	N PROI	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable p disposed w	3925 Iffense# Se DOT Data plicable) Description (income accused as roperty of another with Intent to restore	Accident N clude the sociated knowing t re it to the	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the le or ordin	PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemp	N PROI	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable p disposed w	3925 Iffense# Se DOT Data plicable) Description (income accused as roperty of another with Intent to restore	Accident N clude the sociated knowing t re it to the	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the le or ordin	PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemp	N PROI	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? 0 PennI (if ap Statute I Acts of ti movable p disposed w funds from	3925 Iffense# Se DOT Data plicable) Description (income accused astroperty of another with Intent to restor the benefit programme.	Accident N clude the sociated knowing t re it to the am while fi	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the le or ordin	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pa	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did n	N PROPERTY OF THE PROPERTY OF	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits.	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O PennI (if ap Statute I Acts of ti movable p disposed w funds from	3925 Iffense# Se DOT Data plicable) Description (income accused astroperty of another with Intent to reston the benefit programme to the benefit	Accident Notice the sociated knowing to the am while for	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uily employed with	of the te or ordin	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pa Philadelphia, kr	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did n	N PROPERTY OF THE PROPERTY OF	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? 0 PennI (if ap Statute I Acts of ti movable p disposed w funds from	3925 Iffense# Se DOT Data plicable) Description (income accused astroperty of another with Intent to reston the benefit programme to the benefit	Accident Notice the sociated knowing to the am while for	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT:	of the te or ordin	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pa	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did n	N PROPERTY OF THE PROPERTY OF	PERTY Intentior unless Int Assist	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits.	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable p disposed w funds from	3925 Iffense# Se DOT Data plicable) Description (incomperty of another with Intent to reston the benefit programme 18 901	Accident Notice of Accident Not Accident Notice of Notice o	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with	of the le or ordin lese: In that blen, or belief J'Mar Hende hen the City of I	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pahiladelphia, kr	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did n	N PROPERTY OF THE PROPERTY OF	PERTY Intentior unless Int Assist fy for su	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits.	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or
Offense 2 Lead? O Penni (if ap Statute I Acts of ti movable pi disposed w funds from Inchoa Offens	18 901 A 3925 Iffense# Se DOT Data plicable) Description (income accused asproperty of another with Intent to restor the benefit programme as 18 901 3 491	Accident Noclade the sociated knowing the it to the am while for A	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uily employed with Solicitation 18 902 A A1	of the le or ordin lese: In that blen, or belief J'Mar Hende hen the City of I	PA C.S./ PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Po hiladelphia, kr	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did n	N PROPERTY OF THE PROPERTY OF	PERTY Intention unless I at Assist fy for su Victims	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits.	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or miself and received the
Offense 2	18 901 A 3925 Iffense# Se DOT Data plicable) Description (income accused asproperty of another with Intent to restor the benefit programme as 18 901 Attempte 18 901 3 491 Offense#	Accident Noclade the sociated knowing the it to the am while for A	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uily employed with Solicitation 18 902 A A1 Subsection	of the le or ordin lese: In that blen, or belief J'Mar Hende hen the City of I	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pahiladelphia, kr	le) Counts Interstate IVING STOLE is guility of the probably been andemic Unemplowing he did not	N PROPERTY OF THE PROPERTY OF	PERTY Intentior unless I of Assist fy for su Victims Grade	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits. Age 60 or Older NCIC Offense C	UCR/NIBRS Code Work Zone Is, or disposes of ived, retained, or mself and received the
Offense 2	3925 Iffense# Se DOT Data plicable) Description (income accused asproperty of another with Intent to restor the benefit programme 18 901 3 491 Offense#	Accident Noclade the sociated knowing the it to the am while for A	Subsection umbers name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with 18 902 A A1 Subsection	of the le or ordin lese: In that blen, or belief J'Mar Hende hen the City of I	PA C.S./ PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Po hiladelphia, kr	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did n	N PROPERTY OF THE PROPERTY OF	PERTY Intentior unless I of Assist fy for su Victims Grade	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits.	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or miself and received the
Offense Lead? O Penni (if ap Statute I Acts of ti movable pi disposed w funds from Inchoa Offens Lead? Peni (if a	18 901 A 3925 Iffense# Se DOT Data plicable) Description (income accused astroperty of another with Intent to restor the benefit programme as 18 901 The DOT Data pplicable)	Accident Noclade the sociated knowing the result to the sam while for the same	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uily employed with Solicitation 18 902 A A1 Subsection ent	of the set or ordinate ordinate ordinate ordinate ordinate ordinate ordinate ordinate or	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pohiladelphia, known spiracy 903 18 PA C.S. PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did not	N PROPERTY OF THE PROPERTY OF	PERTY Intention unless to the Assist fy for su Victims Grade	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits. Age 60 or Older NCIC Offense C	UCR/NIBRS Code Work Zone Is, or disposes of ived, retained, or mself and received the
Offense Lead? O Penni (if ap Statute I Acts of ti movable pi disposed w funds from Inchoa Offens Lead? Peni (if a	3925 Iffense# Se DOT Data plicable) Description (income accused asproperty of another with Intent to restor the benefit programme 18 901 3 491 Offense#	Accident Noclade the sociated knowing the result to the sam while for the same	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uily employed with Solicitation 18 902 A A1 Subsection ent	of the set or ordinate ordinate ordinate ordinate ordinate ordinate ordinate ordinate or	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pohiladelphia, known spiracy 903 18 PA C.S. PA Statute (Tit ance): RECE	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did not	N PROPERTY OF THE PROPERTY OF	PERTY Intention unless to the Assist fy for su Victims Grade	NCIC Offense Code Safety Zone nally receives, retain the property is received ance benefits for his inch benefits. Age 60 or Older NCIC Offense C	UCR/NIBRS Code Work Zone Is, or disposes of ived, retained, or mself and received the
Offense 2	18 901 A 3925 Iffense# Se DOT Data plicable) Description (incomperty of another vith Intent to reston the benefit programme 18 901 3 Attempte 18 901 Offense# nDOT Data pplicable) Description (incomperced)	Accident Notation Notation Section Accident Notation Section Accide Numb Clude the	Subsection umber name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with 18 902 A A1 Subsection and employed with 18 902 A	of the le or ordinate or ordin	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pahiladelphia, known possible possi	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did not be counted. A. 1 Interstate	N PROPERTY OF THE PROPERTY OF THE PUBLI	PERTY Intentior unless I of Assist fy for su Victims Grade C RECO	NCIC Offense Code Safety Zone Mally receives, retain the property is received ance benefits for his or his condition to be a second to be a	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or miself and received the lived work zone Ode UCR/NIBRS Code Work Zone
Offense 2	3925 3925	Accident Notated the sociated knowing the relation to the sociated North Accident North North Accident North	Subsection umbers name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with 18 902 A A1 Subsection and er and a statu with this Offer hat it has been sto owner. TO WIT: uilly employed with subsection and statu with this Offer hat it has been sto owner. To with this Offer hat subsection and statu	of the le or ordin lese: In that blen, or belied J'Mar Hende le the City of I lese of the lese of the lese: In that	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pohiladelphia, known page 18 PA C.S. PA Statute (Tit ance): TAMP	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did not	N PROPERTY OF THE PROPERTY OF THE PUBLICATION OF T	PERTY Intentior unless to the Assist fy for su Victims Grade C RECC	NCIC Offense Code Safety Zone Mally receives, retain the property is received ance benefits for his inch benefits. Age 60 or Older NCIC Offense C Safety Zone DRDS n, or false alteration	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or miself and received the Ode UCR/NIBRS Code Work Zone
Offense 2	a 3925 Iffense# Second Description (incomperty of another with Intent to reston the benefit programme Taylor Data pplicable) Offense# 18 901 3 491 Offense# 18 907 Description (incomper to the benefit programme) The control of the benefit programme Taylor Data pplicable) Description (incomper to the accused assorthing belonging)	Accident Notation in Accident	Subsection umbers name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with 18 902 A A1 Subsection ant er name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with 18 902 A	of the learning of the learnin	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pohiladelphia, known possible point ance): TAMP the Defendant ont for information for informatic point for informatic poi	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did not	N PROPERTY OF THE PROPERTY OF THE PUBLICATION OF TH	PERTY Intentior unless I of Assist fy for su Victims Grade C RECO	NCIC Offense Code Safety Zone Mally receives, retain the property is received ance benefits for his inch benefits. Age 60 or Older NCIC Offense C Safety Zone DRDS In, or false alteration we to be kept by other	UCR/NIBRS Code Work Zone Ins, or disposes of ived, retained, or miself and received the ived. Ode UCR/NIBRS Code Work Zone In of, any record, hers for information of
Diffense 2	a 3925 Iffense# Second Description (incomperty of another with Intent to reston the benefit programme Taylor Data pplicable) Offense# 18 901 3 491 Offense# 18 907 Description (incomper to the benefit programme) The control of the benefit programme Taylor Data pplicable) Description (incomper to the accused assorthing belonging)	Accident Notated the sociated the sociated Notated Notated Notated Notated Notated Notated Notated Notated to, or received the sociated to, or received Notated Notate	Subsection umbers name of statu with this Offer hat it has been sto owner. TO WIT: uilly employed with 18 902 A A1 Subsection ant er name of statu with this Offer elved or kept by, the son knowingly userson knowingly use	of the leave of th	PA Statute (Tit ance): RECE the Defendant, ving that it has rson filed for Pohiladelphia, known possible point ance): TAMP the Defendant ont for information for informatic point for informatic poi	le) Counts Interstate IVING STOLE is guilty of the probably been andemic Unemplowing he did not	N PROPERTY OF THE PROPERTY OF THE PUBLICATION OF TH	PERTY Intentior unless I of Assist fy for su Victims Grade C RECO	NCIC Offense Code Safety Zone Mally receives, retain the property is received ance benefits for his inch benefits. Age 60 or Older NCIC Offense C Safety Zone DRDS In, or false alteration we to be kept by other	UCR/NIBRS Code Work Zone Ins, or disposes of lived, retained, or miself and received the Ode UCR/NIBRS Code Work Zone



Docket Number:	Date Filed:	OTN/LiveScan Number R 306 402-5	Complaint/Incident Number FCE-21-0018
Defendant Name:	First:	Middle:	Last:
	J'MAR	MAURICE	HENDERSON

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered $\underline{1}$ through $\underline{5}$.
- 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 that 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)

(Signature of Afflant)

AND NOW, on this date

(Year)

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)

HENDERSON

Docket Number: Date Filed: OTN/LiveScan Number Complaint/Incident Number 306402-3 | Middle: 1113122 ヘイー/りロー コス FCE-21-0018 Last: **Defendant Name:** J'MAR **MAURICE**

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.



-	Docket Number:	Date Filed:	OTN/LiveScan Number 306402-5	Complaint/incident Number FCE-21-0018
		First:	Middle:	Last:
ļ	Defendant Name:	J'MAR	MAURICE	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



	Docket Number: CR-150-32		TN/LiveScan Number りらりのスーケ	Complaint/Incident Number FCE-21-0018
Ī		Fifst:	Middle:	Last:
Ì	Defendant Name:	J'MAR	MAURICE	HENDERSON

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.,



Docket Number: CR-150-a	22 6/13/22	OTN/LiveScan Number	Complaint/Incident Number FCE-21-0018	
	First:	Middle:	Last:	
Defendant Name:	J'MAR	MAURICE	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 PADOL 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

Docket Number:	6/13/32 8.30	TN/LiveScan Number クレイクスーク	Complaint/incident Number FCE-21-0018
	Fifst:	Middle: La	ast:
Defendant Name:	J'MAR	MAURICE HI	ENDERSON

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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

(Signature of Afflant)

Sworn to me and subscribed before me this

19 11_day of

, Magisterial District Judge

My commission expires first Monday of January,

2028

UNC 15, 2022 Date

COUNTY C	VEALTH		:NNSYL	_VANIA								OMPLAI		
Magisterial Di			 7-∩4			水配	9 1	COM	MONV		OF PEN 'S.	INSYLVAI	AIV	
MDJ: Hon. So			4 V I		[DEFEND	ይ ANT:			(NAME an		(22)		
Address: 180	•	-	on St., F	- - - - - - - -	I .	SHANAE			N	(In man 2	JOHN	•		
PA 17103	· - · - · · ·					Irst Name	***************************************		Middle	Name	Last Na		G	Зеп
					5	597 Anche	or St.,	Philadelr	ohia, F	PA 19120				
Telephone: (7	-		1174 - Maio 190 ands.				ŕ	,	·			€€inali — pegi — stepti.	votas "Jagas"	*********
☑ 1-Felony Fu	() 왕년 : 11	海洋 38 . 连			nding Extradit					ounding Sta				
2-Felony Lin				•	nding Extradit			-Misdemea		-	100	☐ Distance:		.
3-Felony Su		States		Misdemea	~			•		ding Extradit	lon			
☐ 4-Felony No	Extradition	l	□ B-	Misdemea	nor Limited		□ F-	-Misdemea	nor Pen	ding Extradit	ion			
AND THE STATE OF THE PARTY OF T	表心影力		业 海拉 樹生		EFENDANT						演员 直贯			
Docket Number		, ,	Date Filed	/ en +a	OTN/LiveSca		, ,	omplaint N			Number	Request La		es?
CK-14 GENDER		1/03/19		<u>d.</u>	1500	6291		BCE-210		/ DCE	210270	Co-Defenda		
GENDER ☐ Male	DOR T	1/U3/19 First Nam		POB	·····	Middle Na	-ma	Add'l D	OB	/ / Last Name		Co-Deletius		
☐ Male ☐ Female	ALCA	LH2(Men	ue			Middle	alne			Last Maine			Ger	۱.
RACE	AKA	e		Aslan	······································	<u> </u>	⊠ Black	:		Native Americ	an	Unknown		
ETHNICITY	Hisp	enic		⊠ No	on-Hispanic		Unkn					—————————————————————————————————————		
	RY (Gray)	RED	(Red/Aubn.	.)	SDY (Sar	ndy)	☐ BLU ((Blue)	☐ PLE	E (Purple)		BRO (Brov	vn)	
Hair Color B	-K (Black)	☐ ong	(Orange)		☐ WHI (Wh	ile)	□ xxx	(Unk./Bald)	☐ GR	N (Green)		PNK (Pink)	
	N (Blonde /	Strawberry)												
, , .	K (Black)			J (Blue)) (Brown)		GRN (Gr	een)			GRY (Gray)		
!	AZ (Hazel)		MA!	R (Maroon)	☐ PNK	C(Pink)		MUL (Mu	lticolored)		(XX (Unknown)		
DNA		YES [□ NO □	DNA Loca	ition							WEIGH:	(lbs.)	
FBI Number					MNU Numb	er								
Defendant Fin	gerprinted		YES 🔲	NO								Ft. HE	IGHT In.	
Fingerprint CI	assificatio					4						5	4	
Fingerprint CI	assificatio	n:				ANT VEHIC			School	al Vah	Oth NC			
Fingerprint CI Plate #	assificatio		Haz mat	Stick	Registration		Comr	RMATION n'I Veh.	School	ol Veh. 🔲	Oth. NCI	5 C Veh, Code	4 Reg	
Plate #	assificatio	n:	Haz	<u> </u>	Registration er (MM/YY)		Comr	π'l Veh. I. □	Schoo		Oth. NCI	C Veh. Code	Reg same De	as f.
	assificatio	n:	Haz mat	Stick Year	Registration		Comr	π'l Veh. I. □	School	ol Veh. Style	Oth. NCI		Reg	as f.
Plate #		n: State	Haz mat	Year	Registration er (MM/YY) Make	n /	Comr Ind Mod	n'l Veh. I. □			Oth. NCI	C Veh. Code	Reg same De	as f.
Plate # VIN Office of the	e attorney	State for the (Haz mat □	Year nwealth	Registration ter (MM/YY) Make	n / red □ Dis	Mod sapprov	n'i Veh. I. □ Iel red becau	Jse:	Style		C Veh. Code	Reç same De	as f.]
Plate # VIN Office of the	e attorney	state for the (Haz mat □	Year nwealth	Registration ter (MM/YY) Make	n / red □ Dis	Mod sapprov	n'i Veh. I. □ Iel red becau	Jse:	Style		C Veh. Code	Reç same De	as f.]
Plate # VIN Office of the	e attorney	state for the (Haz mat □	Year nwealth	Registration er (MM/YY) Make Approv e complaint, a	n / red □ Dis	Mod sapprov	n'i Veh. I. lel red becau	JSO: e appro	Style		C Veh. Code	Reç same De	as f.]
Plate # VIN Office of the (The attorney filling, See Pa. DAG KATHE	e attorney for the Com R.Crim.P. & RINE MC	state for the (monwealth 507).	Haz mat Common	Year nwealth	Registration er (MM/YY) Make Approv e complaint, a	n / red □ Dis	Mod sapprov	n'i Veh. I. lel red becau	JSO: e appro	Style		C Veh. Code	Reç same De	as f.]
Plate # VIN Office of the	e attorney for the Com R.Crim.P. & RINE MC	state for the (monwealth 507).	Haz mat Common	Year nwealth	Registration er (MM/YY) Make Approv e complaint, a	n / red □ Dis	Mod sapprov	n'i Veh. I. lel red becau	JSO: e appro	Style		C Veh. Code	Reç same De	as f.]
Plate # VIN Office of the (The attorney if filing. See Pa. DAG KATHE (Name of the attorney if the attorney	e attorney for the Com R.Crim.P. 5 RINE MC orney for the	state for the (monwealth 507). DERMOT	Haz mat Common	Year nwealth	Registration er (MM/YY) Make Approv e complaint, a	n / red □ Dis	Mod Sapprov nt affidavi	red becau	e appro	Style		C Veh. Code	Reg same Der	as f.]
Plate # VIN Office of the (The attorney filling, See Pa. DAG KATHE	e attorney for the Com R.Crim.P. 5 RINE MC orney for the	state for the (monwealth 507). DERMOT	Haz mat Common	Year nwealth	Registration er (MM/YY) Make Approv e complaint, a	n / red □ Dis	Mod Sapprov nt affidavi	red becau	use: e appro-	Style ved by the all $(\frac{1}{2} / \frac{2}{4} / \frac{2}{2})$	ttorney for t	C Veh. Code	Ret same Det	as f.]
Plate # VIN Office of the (The attorney filling. See Pa. DAG KATHE (Name of the attorney filling).	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affiant)	state for the (monwealth (507). DERMOT Commonwe	Haz mat Common h may requ	Year nwealth uire that the	Registration er (MM/YY) Make Approvie complaint,	n / red □ Dis	Mod Sapprov nt affidavi	red becau it, or both both Comm	e approvention ventile 4812	ved by the at $\frac{1}{2}$ $\frac{1}{2}$ $\frac{1}{2}$ -Assigned A	ttorney for t	Color Color he Commonw	Ret same Det	as f.]
Plate # VIN Office of the (The attorney filling. See Pa. DAG KATHE (Name of the attorney filling). I, SA TAR (Name of the of the control of the pen)	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affiant)	state for the (monwealth (507). DERMOT Commonwe	Haz mat Common may require the may require the major requirement of the	Year Nwealth uire that the	Registration der (MM/YY) Make Approvie complaint, se com	n / /ed 口Dis arrest warran のかいとも ignature of the	Mod Sapprov nt affidavi	red becaused by the Community of the Community (PSP/MI)	e approvention wealth	ved by the at (a / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 /	ttorney for t	Color Color he Commonw	Ret same Det	as f.]
Plate # VIN Office of the (The attorney filling, See Pa.) DAG KATHE (Name of the attorney filling) I, SA TAR (Name of the attorney filling) of Pen (Identify Decided)	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affiant)	state for the (monwealth (507). DERMOT Commonwe BTAG Mia Officer Agency F	Haz mat	Year Nwealth uire that the	Registration er (MM/YY) Make Approvie complaint,	n / /ed 口Dis arrest warran のかいとも ignature of the	Mod Sapprov nt affidavi	red becaused by the Community of the Community (PSP/MI)	e approvention wealth	ved by the at $\frac{1}{2}$ $\frac{1}{2}$ $\frac{1}{2}$ -Assigned A	ttorney for t	Color Color he Commonw	Ret same Det	as f.]
Plate # VIN Office of the (The attorney filling, See Pa.) DAG KATHE (Name of the attorney filling) I, SA TAR (Name of the attorney filling) of Pen (Identify Decided)	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affiant) insylvar epartment o y state: (state for the (monwealth 507). DERMOT Commonwe BTAG nia Officer Agency For Check appropriate to the common series of the common ser	Haz mat D	Year Nwealth uire that the ttorney led and Pol te box)	Registration der (MM/YY) Make Approvie complaint, approvie complaint, description der complaint, description des	n / /ed □ Dis arrest warran Orosed ignature of the	Commended Model Model Sapprovent affidavional Affidaviona	red because of the Community of the Community (PSP/MI)	e approventh	ved by the at (a / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 /	ttorney for t	Color Color he Commonw	Ret same Det	as f.]
Plate # VIN Office of the (The attorney filling. See Pa. DAG KATHE (Name of the attorney) I, SA TAR (Name of the attorney) of Pen (Identify De do hereb 1. 🖾 I according to the attorney)	e attorney for the Com R.Crim.P. 5 RINE MC orney for the YN LIEE ne Affiant) insylvar epartment o y state: (ouse the a	state for the (monwealth 607). DERMOT Commonwe BTAG nia Officer Agency Forheck apabove na	Haz mat	Year Nwealth uire that the ttorney led and Pol te box) ifendant	Registration der (MM/YY) Make Approvie complaint, approvie complaint, description der complaint, description des	n / /ed □ Dis arrest warran Oroved Ignature of the	Commundation Model sapprov nt affidavi electationey fr B	red becau it, or both both Comm ADGE # (PSP/MI PAO (Police /	e approvente approvent	ved by the at (a / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 /	ttorney for t	Color Color he Commonw	Ret same Det	as f.]
Plate # VIN Office of the (The attorney filling. See Pa. DAG KATHE (Name of the attorney) I, SA TAR (Name of the attorney) of Pen (Identify De do hereb 1. 🖾 I according to the attorney)	e attorney for the Com R.Crim.P. 5 RINE MC orney for the YN LIEE ne Affiant) insylvar epartment o y state: (ouse the a	state for the (monwealth 607). DERMOT Commonwe BTAG nia Officer Agency Forheck apabove na	Haz mat	Year Nwealth uire that the ttorney led and Pol te box) ifendant	Registration for (MM/YY) Make Approving complaint, so the compla	n / /ed □ Dis arrest warran Oroved Ignature of the	Commundation Model sapprov nt affidavi electationey fr B	red becau it, or both both Comm ADGE # (PSP/MI PAO (Police /	e approvente approvent	ved by the at (a / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 /	ttorney for t	Color Color he Commonw	Ret same Det	as f.]
Plate # VIN Office of the (The attorney tilling. See Pa. DAG KATHE (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney tilling. See Pa.)	e attorney for the Com R.Crim.P. 5 ERINE MC corney for the YN LIEE the Affiant) insylvar epartment of y state: (course the course th	state for the (monwealth (507). DERMOT Commonwe BTAG Ma Officer Agency Ficheck approacheck appro	Haz mat	Year Nwealth uire that the ttorney ted and Pol te box) fendant versions and the	Registration for (MM/YY) Make Approving Complaint, and Subdiving	red Disarrest warran	Commundation Modes Sapprovent affidaviate attorney for B.	red because of the Common of t	e approvention wealth POETC 22240 Agency ove	ved by the at (a / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 / 2 /	ttorney for t	Color Color he Commonw	Reg same De Communication of Communicati	as f.]
Plate # VIN Office of the (The attorney filing. See Pa. DAG KATHE (Name of the attorney filing. See Pa. I, SA TAR (Name of the attorney filing. See Pa. I, SA TAR (Name of the attorney filing. See Pa. I, SA TAR (Name of the attorney filing. See Pa. I according to the see See See See See See See See See Se	e attorney for the Com R.Crim.P. 5 RINE MC corney for the YN LIEE the Affiant) insylvar epartment of y state: (i) the course the cou	state for the (monwealth (507). DERMOT Commonwe BTAG Agency Ficheck apabove na defendant d	Haz mat	Year Nwealth uire that the ttorney ted and Pol te box) fendant vera name is	Registration for (MM/YY) Make Approving Approving Complaint, and popularity and	red District	Commended in the second of the	red becaulif, or both both the Common PAO (PSP/MI) PAO (Police / It forth aboth describe paickname)	e approvente la	ved by the at (a /4 / 24) -Assigned A OO ORI Number	offiant ID Number 1	C Veh. Code Color he Commonw	Reg same De Communication (Date)	e to
Plate # VIN Office of the (The attorney tilling. See Pa. DAG KATHE (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney tilling) of Pen (Identify De do hereb 1. I according to the according to the attorney tilling) according to the accord	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affant) insylvar epartment o y state: (euse the c touse the c fore designibility the	state for the (monwealth 507). DERMOT Commonwe BTAG Mia Offic or Agency F check ap above na defendant defendant defendant	Haz mat mat Common h may require TT ealth) Ce of Al Represente propriate amed de nt whose as John I I laws of	Year Nwealth uire that the ttorney ted and Pol te box) fendant vera name is	Registration for (MM/YY) Make Approving Complaint, and Subdiving	red District	Commended in the second of the	it, or both both the Common (PSP/MI) PAO (Police / It forth about describe at (301)	e approvented as are un	Style ved by the al is /4/20 -Assigned A 00 ORI Number	fliant ID No	C Veh. Code Color he Commonwell mber & Badge	Reg same De Communication (Date)	er to
Plate # VIN Office of the (The attorney filing. See Pa. DAG KATHE (Name of the attorney filing. See Pa. I, SA TAR (Name of the attorney filing. See Pa. I, SA TAR (Name of the attorney filing. See Pa. I, SA TAR (Name of the attorney filing. See Pa. I according to the see See See See See See See See See Se	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affant) insylvar epartment o y state: (euse the c touse the c fore designibility the	state for the (monwealth 507). DERMOT Commonwe BTAG Mia Offic or Agency F check ap above na defendant defendant defendant	Haz mat mat Common h may require TT ealth) Ce of Al Represente propriate amed de nt whose as John I I laws of	Year Nwealth uire that the ttorney ted and Pol te box) fendant vera name is	Registration for (MM/YY) Make Approving Approving Complaint, and popularity and	red District	Commended in the second of the	it, or both both the Common (PSP/MI) PAO (Police / It forth about describe at (301)	e approvented as are un	Style ved by the al is /4/20 -Assigned A 00 ORI Number	fliant ID No	C Veh. Code Color he Commonw	Reg same De Communication (Date)	e to
Plate # VIN Office of the (The attorney tilling. See Pa. DAG KATHE (Name of the attorney tilling. See Pa. I. SA TAR (Name of the attorney till	e attorney for the Com R.Crim.P. & RINE MC orney for the YN LIEE ne Affant) insylvar epartment o y state: (euse the c touse the c fore designibility the	state for the (monwealth 507). DERMOT Commonwe BTAG Ma Offic or Agency F check ap above na defendant defendant quated a ne penal pA 1712	Haz mat mat Common h may require TT ealth) Ce of Al Represente propriate amed de nt whose as John I I laws of 21	Year Nwealth uire that the ttorney ted and Pol te box) fendant vera name is	Registration for (MM/YY) Make Approving Approving Complaint, and popularity and	red Distanced warrant Droved in the addition to me but the of Pennin designation of Pennin designation in the pennin designation of Pennin designation	Modesapprovent affidavi electes attorney for B. ress set t who is sylvania	red becault, or both both the Common (PSP/MI) PAO (Police / If forth about describe at [301] (Subdice in the Common (Subdice in the Comm	e approvente de la serie un vision de la ser	Style ved by the al is /4/20 -Assigned A 00 ORI Number	of the state of th	C Veh. Code Color he Commonwell mber & Badge	Reg same De Communication (Date)	e to

							A. 100 P.	PU	…ICE(KIMINAL	CU	MIPLAINI
Docket No	umber: 46-2.	Date F スクルルタ	iled:		I/LiveScar		y			laint/Incident N 210270	lumbe	r
Defendan	() 秦 [] [] [(4)]	_ First:		1	Middle:	/ <u>&</u>	na P	Las	t:			
	SHANAE N JOHNSON											
When the (Set forth a without mo	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 <i>brief</i> 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	1,000	·F ·	Sollcitation 18 902 A		nspiracy 903	•		N	umber of \	/ictims Age 60 o	r Older	
	L 39	22	A3	of the	TITLE 18	3	1	F:	3			
Leau?	Offense #	Section	Subsection		PA Statute	(Title)	Count	s	Grade	NCIC Offense Code	U	CR/NIBRS Code
1.000 Apr. 140 (140 pt 1713 pt	DOT Data plicable)	Accident Ni	imber	-	***************************************		Interstat	е		Safety Zone		☐ Work Zone
		(include the	name of stat	ute or ordir	nance): T	EFT BY	DECEPT	TON		***************************************		**************************************
that she w	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											
Offens		901 A	18 902 A		903			manuel ()	Age or of Order		
	2 :	3925	Α	of the	TITLE 1	L8	1		F3			
Lead?	Offense# nDOT Data	Section Accide	Subsection int	1	PA Statu			ints	Grade	NCIC Offense	ode	UCR/NIBRS Code
	pplicable)	Numb	e ——— name of stat	uto or ordi	nanco): Bi		☐ Inters		ŀ	Safety Zone		☐ Work Zone
	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.											
Inchos Offens	ES RESSE	ttempt 3 901 A	☐ Solicitatio 18 902 A		Conspiracy 8 903		N	umber	of Victims	Age 60 or Older	-	•
	11	4911	A1	of the	8		1		F3			
Lead? Pen	Offense# nDOT Data	Section Accidi	Subsectio	n	PA Statu	ute (Title)		unts	Grade	NCIC Offense	Code	UCR/NIBRS Code
(lf a	applicable)	澤 🖟 Numb		tute or ordi	inance): T	AMPERI	☐ Inter		<u>l</u> _	Safety Zone		☐ Work Zone
record, do	ocument or th	ing belonging to	, or received or	kept by, the	government	for infor	nation o	r record	i, or require	a false entry in, o ed by law to be k lications she subn	ept by c	

Docket Number: CR-146-22	Date Filed: 0'	TN/LiveScan Number	Complaint/Incident Number BCE-210270
建一部(第7条)集广播广系	First:	Middle:	Last:
Defendant Name:	SHANAE	N	JOHNSON

- 2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- 3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- 4. This complaint consists of the preceding page(s) numbered 1 through 3.
- 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 that 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

AND NOW, on this date

6/10/2022

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.

(Magisterial District Court Number)

(Issuing Authority)



Docket Number: Date Filed: CL-146-22 06/18/122	OTN/LiveScan Number R306391-6	Complaint/Incident Number BCE-210270	
First:	Middle:	Last:	
SHANAE	N	JOHNSON	

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Taryn Liebtag, #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."



Docket Number:	Date Filed: O'	TN/LiveScan Number	Complaint/Incident Number BCE-210270
Defendant Name:	First:	Middle:	Last:
Defendant Name:	SHANAE	N	NOSNHOL

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 armi1216@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 arm[1216@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 XXXXXXX0323 to



Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
CR-146-22	06/13/22	K306291-6	BCE-210270
(左右) 拟开套管 被禁贿 "如你	First:	Middle:	Last:
Defendant Name:	SHANAE	N	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, the 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.

被	POLICE	CRIMINAL	COMPL	ΔΙΝΤ
"San Carlot St. St. St.	PULICE	CKIIVIIIVAL	COMILE	AIN I

Docket Number:	Date Filed: O	TN/LiveScan Number	Complaint/Incident Number
CL-146-22	06/13/22 K3	06391-6	BCE-210270
星頭 東 第 新 新	First:	Middle:	Last:
Detendant Name:	SHANAE	N	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	- Andrew State - Andr	/ex	#812
	·	and the second s	(Signature of A	ffiant)
Sworn to me and subscribed before me this	the day of	JUN	۳	MINNEY DE
My commission expires first Monday of January,	1110 X	/	Magisterial Ristr	or PENNS ict Judge

COUNTY OF	:DAUI	PHIN			LVANIA						VEALTH	OF PEN	OMPLA Insylva	
Magisterial Dist				4			LONG HEAT 2) ,				S.		
MDJ: Hon. Son							EFEND	ANT:			(NAME an		•	
Address: 1805	North	Came	ron S	St., I	Harrisbu		TACEY			DJUA		MOUL	· · · · · · · · · · · · · · · · · · ·	_
PA 17103						F	irst Name			Middle	Name	Lasi Na	me	Gen
Telephone: (71	71233	-3500				3	061 TEM		ROAD . PA. 1915	:O	,			
releptione. (7 x	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					NCIC					·			
☑ 1-Felony Full						nding Extradit		1 5000	C-Misdemea	nor Sun	ounding Sta	les	Distance	
2-Felony Limit	ed				_	nding Extradit			D-Misdemea	nor No I	Extradition		L. Distance	*
3-Felony Surro		States			Misdemea				E-Misdemea	nor Pen	ding Extradit	lon		
4-Felony No E	_					nor Limited		•	F-Misdemeal					ů.
						EFENDANT.	DENTIFICA							
Docket Number			Date	Filed		DTN/LiveSca		1	Complaint N		Incident	Number	Request La	b Services
CR-147		72	Dal	131	122	1230	11 -1-	2-0	BCE-210	274			☐ YES	⊠ NO
GENDER	DOB	11/15/	1957		POB				Add'l D	ОВ	/ /		Co-Defend	ant(s)
☐ Male .	**	First N					Middle N	ame	1		Last Name			Gen.
⊠ Female	AKA									1				
RACE	□Wh	ile			Aslan			⊠ Bla	ck		Native Americ	an	Unknown	
ETHNICITY	☐Hls	panic			⊠ No	on-Hispanic		Մո	known					·
☐ GRY	(Gray)	R	ED (Red	d/Aubn	l.)	SDY (Sar	idy)	☐ BL	U (Blue)	☐ PLI	E (Purple)		BRO (Bro	wn)
Hair DBLK	(Black)		NG (Ora	ange)		☐ WHI (Whi	(e)	□ xx	X (Unk./Bald)	☐ GR	N (Green)		PNK (Pin	k)
	(Blonde	Sirawben	ny)											
Eye BLK	(Black)			☐ BLI	U (Blue)	⊠ BRC	(Brown)	.,	GRN (Gr	een)			RY (Gray)	
Color HAZ	(Hazel)		ı		R (Maroon)	☐ PNK	(Pink)		MUL (Mu	lticolorec)	□×	XX (Unknown)	
DNA		☐ YES	10	NO	DNA Loca	ation							WEIGH	IT (Ibs.)
FBI Number						MNU Numb	er							
Defendant Finge	erorinte	d IT] YE\$	П	NO			• • • •	***************************************				Ft. H	EIGHT In.
Fingerprint Clas	<u> </u>		1			** *		· · · · · · · · · · · · · · · · · · ·				·	5	4
1 million betriefe mitte	41112					DEFEND	ANT VEHIC	LE INF	ORMATION					
						DEL 6180 7						OIL NO	C Veh. Code	Reg.
		Sta		Haz	1	Registration	1		nm'i Ven.	Scho	ol Veh. 🔲	Out. NO	O FUIL ODGE	
Plate#		Sta		mat	Stick		' /		nm'i Veh. nd. 🏻	Scho	ol Veh. 🔲	Otti, Moi	O 4011, Obde	same a
		Sta			Stick	Registration er (MM/YY)	1	l		Scho		Olii, RGi	Color	same as Def.
Plate #		Sta		mat	<u> </u>	Registration	<u>' /</u>	l	nd. 🏻	Scho	ol Veh. □	Otti, NO		same a
VIN	attorne			mat	Year	Registration er (MM/YY) Make		M	nd. 🗍			Olli, Noi		same as Def.
VIN Office of the a		y for the	e Cor	mat 	Year	Registration er (MM/YY) Make Approv	ed 🗆 Di	M sappro	nd. 🔲	ıse:	Style		Color	Same as
VIN	the Cor	y for the	e Cor	mat 	Year	Registration er (MM/YY) Make Approv	ed 🗆 Di	M sappro	nd. 🔲	ıse:	Style		Color	Same as
VIN Office of the a (The attorney for filling. See Pa.R.	the Cor Crim.P.	y for the	e Cor	mat 	Year	Registration er (MM/YY) Make Approv	ed 🗆 Di	M sappro	nd. 🔲	ıse:	Style ved by the at	torney for t	Color	Same as
VIN Office of the a (The attorney for filling. See Pa.R. DAG KATHER	the Cor Crim.P.	y for the	e Cor	mat mmo	Year	Registration (er (MM/YY) Make Approviation (a complaint, a	ed Diarrest warra	sappro	nd. podel poved becau avil, or both b	e appro	Style ved by the at		Color	same as Def.
VIN Office of the a (The attorney for filling. See Pa.R.	the Cor Crim.P.	y for the	e Cor	mat mmo	Year	Registration (er (MM/YY) Make Approviation (a complaint, a	ed Diarrest warra	sappro	nd. 🔲	e appro	Style ved by the at	torney for t	Color	Same as
Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorn	the Cor Crim.P. INE Mo ley for the	y for the	e Cor alth ma OTT wealth)	mat mmo ay req	Year Nwealth uire that th	Registration (er (MM/YY) Make Approviation (a complaint, a	ed Diarrest warra	sappro	odel oved becau avil, or both b	e appro	Style ved by the at	torney for t	Color	same as Def.
VIN Office of the a (The attorney for filling. See Pa.R. DAG KATHER	the Cor Crim.P. INE Ma ley for the	y for the	e Cor alth ma OTT wealth)	mat mmo ay req	Year Nwealth uire that th	Registration (er (MM/YY) Make Approviation (a complaint, a	ed Diarrest warra	sappro	odel oved becau avil, or both by y for the Comm	e appro	Style	torney for t	Color	yealth prior to
Office of the a (The attorney for filling. See Pa.R. DAG KATHER (Name of the attorn 1, S/A MICH (Name of the	the Cor Crim.P. INE Maney for the HAEL Affient)	y for the minorwes 507). CDERM COMMON	e Cor alth me OTT wealth)	mat	Year Nealth uire that th	Registration ser (MM/YY) Make Approviacion complaint, services	ed Diarrest warra	sappro	odel oved becausely, or both by for the Comment	e appro	Style ved by the at	torney for t	he Commony	yealth prior to
Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorney) 1, S/A MICH (Name of the attorney)	the Cor Crim.P. INE Maney for the HAEL Afflant)	y for the minorwes 507). CDERMONICOMM	e Cor alth me OTT wealth) CHOI	mat mmo ay req LAS	Year nwealth uire that th	Registration For (MM/YY) Make Approviate complaint, and accomplaint, accompl	ed Diarresi warra	sappro	odel oved because over both by for the Community (PSP/M)	e appro	ved by the at	torney for to	he Commony	yealth prior to
Office of the a (The attorney for filling. See Pa.R. DAG KATHER (Name of the attorn 1, S/A MICH (Name of the	the Cor Crim.P. INE Manager for the HAEL Afflant) SVIVA	y for the minorwes 507). CDERMONICOM	e Cor alth ma OTT wealth) CHOI	mat mmo ay req LAS	Year Nealth Ulre that the	Registration For (MM/YY) Make Approviate complaint, and accomplaint, accompl	ed Diarresi warra	sappro	odel oved because over both by for the Community (PSP/M)	e appro	Style ved by the at	torney for to	he Commony	yealth prior to
VIN Office of the attorney for filling. See Pa.R. DAG KATHER (Name of the attorney for filling). See Pa.R. I, S/A MICH (Name of the of Penn (Identify Depart).	the Cor Crim.P. INE Mi iey for the IAEL Affiant) sylva artment state:	y for the mmonwer 507). CDERM COMMON MCNIC	e Correllin me	mat	Year Nealth Uire that th ttorney led and Po te box)	Registration Regis	ed Distribution Di	sappront affida	podel oved becausely, or both by for the Commerce (PSP/M) PAO (Police /	e appro conwealth POETC 2224(Agency	ved by the at	torney for to	he Commony	yealth prior to
Vin Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorn 1. S/A MICH (Name of the of Penn (Identify Depart do hereby 1. 🖾 I accust	the Cor Crim.P. INE Money for the Afficient) SVIVA artment state: se the	y for the minonwer 507). CDERM COMMON MCNIC nia Of or Agency (check above	e Cor alth ma OTT wealth) CHOI flce (mat mmo mmo LAS of A resent	Year Neelth Uire that th ttorney ted and Po te box) efendant	Registration (MM/YY) Make Approving complaint, of the complaint,	ed Die	sappront affida	podel poved becau avil, or both b y for the Comm (PSP/M) PAO (Police /	e appro lonwealth 4853 POETC 2224(Agency	ved by the at	torney for to	he Commony	yealth prior to
Vin Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorn 1. S/A MICH (Name of the of Penn (Identify Depart do hereby 1. 🖾 I accust	the Cor Crim.P. INE Money for the Afficient) SVIVA artment state: se the	y for the minonwer 507). CDERM COMMON MCNIC nia Of or Agency (check above	e Cor alth ma OTT wealth) CHOI flce (mat mmo mmo LAS of A resent	Year Neelth Uire that th ttorney ted and Po te box) efendant	Registration Regis	ed Die	sappront affida	podel poved becau avil, or both b y for the Comm (PSP/M) PAO (Police /	e appro lonwealth 4853 POETC 2224(Agency	ved by the at	torney for to	he Commony	yealth prior to
VIN Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorn 1, S/A MICH (Name of the attorn) 1, Lacourt (Name of the attorn) 1, A MICH (Name of the attorn) 1, A MICH (Name of the attorn) 1, A MICH (Name of the attorn)	the Cor Crim.P. INE Manager for the HAEL Afflant) SVIVA artment state: se the	y for the minonwest 507). CDERM COMMONIC MINOR OF Agency (check above defended.	e Cor alth me OTT wealth) CHOI cy Repro appro name	mat mmo mmo ay req hoseled de	Year Neelth Ulre that the the that the that the that the that the that the the the that the the the that the the the the the the the the the th	Registration (MM/YY) Make Make Approving Complaint, statement of the complaint of	ed Dispersed warra	sappront affida	podel oved becau avil, or both b y for the comm PAO (PSP/M PAO (Police of the describe)	e appro 853 POETC 2224(Agency	Style ved by the al -Assigned A OO ORI Number	torney for t	he Commonv	vealth prior to
VIN Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorn 1, S/A MICH (Name of the attorn (Identify Depart do hereby) 1. 🖾 I accust laccust laccus	the Cor Crim.P. INE Manager for the HAEL Afflant) SVIVA authorit state: se the se the	y for the minonwest 507). CDERM COMMONIC MINOR OF Agency (check above defended defe	e Cor alth me OTT wealth) CHOI cy Repro appro appro ant w	mat	Attorney led and Po lete box) lefendant le name i	Registration (MM/YY) Make Approving complaint, of the complaint,	ed Dispersed warra	sappront affida	podel oved becau avil, or both b y for the comm PAO (PSP/M PAO (Police of the describe)	e appro 853 POETC 2224(Agency	ved by the all	torney for t	he Commonv	vealth prior to
VIN Office of the a (The attorney for filing. See Pa.R. DAG KATHER (Name of the attorney) 1. S/A MICH (Name of the attorney) 1. S/A MICH (Name of the attorney) 1. S/A Lacoust (Identify Depart do hereby) 1. I accust lacoust (Incomplete the accust lacoust the accust the accust lacoust (Incomplete the accust lacoust laco	the Cor Crim.P. INE Manager for the least f	y for the mmonwer 507). CDERM COMMON	e Correlith me OTT Towealth) CHOI CHOI CHOI CHOI CHOI CHOI CHOI CHOI	mat mmo ay req LAS of A resenta	Attorney ted and Po te box) efendant e name i	Registration (MM/YY) Make Make Approving Complaint, statement of the complaint of the c	ed Dispersed warra	sappront affida	podel oved becau avil, or both b y for the comm (PSP/M) PAO (Police of the describe) rtickname nia at 13011	e appro e appro e appro e appro 2853 POETC 2224(Agency ove ed as	Assigned AOOOORI Number	torney for to 2222	he Commonv	vealth prior to D/2022 (Date)

on or about JUNE 2020 TO NOVEMBER 2020

in DAUPHIN County

[22]

(County Code)

						цC	数 b(DLICE	CRIMINAL	COMPLAINT
Docket Nur	nber:	Date File			yeScan N		<u></u>		piaint/incident N	umber
<u>K-17</u>	1-00	<i>OG 131</i> First:	dd 1º	Mide	0320		<u> </u>	BCb ast:	E-210274	
Defendant	Name: 🔆	STACEY			JAN		I	asi. 10ULTRI	E	****
When ther (Set forth a b without more The age of the	e is more the rief summary is not sufficite victim at the	an one offer of the facts suff ent. In a summa time of the offe	nse, each offe licient to advise try case, you mu	ense should the defendant ist cite the spe luded if known	be numb of the naturalic section. In addition	pered core of the send of the	nronolog offense(s) subsection security n	Jically. charged. A n(s) of the s umbers and	citation to the statu statule(s) or ordinan I financial informatio	ated, if appropriate. Ite(s) allegedly violated, ce(s) allegedly violated. on (e.g. PiNs) should not
inchoate Offense	☐ Attempt 18 901 A		Solicitation 18 902 A	☐ Consp 18 903				Number o	f Victims Age 60 o	Older
⊠ 1	4911		AZ	itue TI	TLE 18			F3		
Leadi	#	Section	Subsection	Р	A Statute (Ti	lle)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDC (if appl		Accident Num	ber			□ Int	erstate		Safety Zone	☐ Work Zone
Inchoste										
	2 39	22	A3	ortio T	ITLE 18		1	F3	-	
Lead? (Olfense#	Section	Subsection		PA Statute (Tille)	Counts	Grade	NCIC Offense C	ede UCR/NIBRS Code
	OT Data Dicable)	Accident Number	1				Interstate		☐ Safety Zone	☐ Work Zone
Acts of the deception. Adeceiver kno	e accused a person decel ws to be influent of Pennsylvania	ssociated wives if he/she intended in the second another in the second another in the second in the	tentionally falls t to whom he/she	SO: A person is o correct a fals stands in a fid istry Pandemic	s guilty of the se impression incuary or co Unemployi	heft If he on which confidenti ment Ass	she Intentine deceival relation	tionally obtourer previous ship. Stace UA) funds b	sly created or reinfor by D. Moultrie applied	
Inchoste Offense			Solicitation 18 902 A	☐ Cons			Numb	er of Victin	ıs Age 60 or Older	
· · · · L		25	Α	orane T	ITLE 18		1	F3		
	Offense# OOT Data	Section Accident	Subsection		PA Statute (· · · · · · · · · · · · · · · · · · ·	Counts	Grade		
Statute Do Acts of the property of a	enother knowl	issociated w	en stolen, or be	se; A person i lleving that it i	s gullty of t	heft If he	/she Inter	PROPERTY attornally recess the prop	elves, retains, or dis erty is received, reta	ained, or disposed with
		wher. The gen Wing that it had		any received a	nerained	\$20,805	,uu ii mo\	ravie prope	ry belonying to the	Pønnsylvania Department

			POLICE CRIMINAL COMPLAINT
Docket Number:	Date Filed:	OTN/LiveScan Numb	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY	Middle: DJUAN	Last: MOULTRIE
2. I ask that a warramade.	ant of arrest or a sum	mons be issued and that the	defendant be required to answer the charges I have
belief. This verif	acts set forth in this or ication is made subje- ication to authorities.	omplaint are true and correct ct to the penaities of Sectior	t to the best of my knowledge or information and 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating
4. This complaint o	onsists of the precedi	ing page(s) numbered <u>1</u> thro	ough <u>8</u> .
System of Penns Information and o The acts committe of Pennsylvania ar	y/vania that require fil documents, d by the accused, as i d were contrary to the of arrest can be iss	ling confidential information listed and hereafter, were as e Act(s) of the Assembly, or	gainst the peace and dignity of the Commonwealth in violation of the statutes cited, sworn to before the
S/A MICHAEL MC	NICHOLAS		
•		(Date)	(Signature of Afflant)
AND NOW, on this d	ate June	15, 2022 Loerlify th	at the complaint has been properly completed and verified.
An affidavit of probal	ole cause must be comp	oleted before a warrant can be i	ssued.
(Magisterial District (2-04 Court Number)	(Issuing Authority)	A A CISTRIC

Docket Number:	Date Filed:	OTN/LiveScar	Number Complaint/	ncident Number
4-141 20	First:	Middle:	Last:	4 (7
Defendant Name: 🛷	STACEY	DJUAN	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 Affiants 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 Affiants 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 Affiants 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 though 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 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."

I	Docket Number: Date Filed: C		O1	TN/LiveScan Number		Complaint/Incident Number	
	CR-147-31	06/13/22	12 3	306.320-0		BCE-210274	
Į		First:		Middle:	Last:		
	Defendant Name:	STACEY		DJUAN	MOL)LTRIE	

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-digit Card Number: XXXXXXXXXXXXXXXXX6067 (FAN2), 8061 Temple Road 19150, Birth Date: November 15, 1957, Home Phone: 2157386837 and email address stacey55@icload.com. Transaction history and IP address were also provided.

	Docket Number:			TN/LiveScan Number	4	Complaint/Incident Number	
1	(R-147-12	06/13/20	1	306320-0	9	BCE-210274	
1	Paul malaud Muna	First:		Middle:	L	ast:	
-	Defendant Name:	STACEY		DJUAN	N	IOULTRIE	

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. Moultrle. This Search Warrant was served on Wells Fargo Bank, Harrisburg Capitol Branch located at 30 N. 3rd Street, Sulte 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 same 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. One 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 Liebtag interviewed Stacey Moultrie in reference to her application for Pennsylvania Pandemic Unemployment Assistance (PUA) as well as the payments she received.



Docket Number:		TN/LiveScan Number	Complaint/Incident Number
CR-147-32	6/13/23 123	66320-0 <u> </u>	BCE-210274
	First:	Middle:	Last:
Defendant Name:	STACEY	DJUAN .	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 Liebtag 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.

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.

Andre II					
SEP P	വഥ	`F CR	ΙΜΙΝΔΙ	COMPL	DINT

Docket Number:	Date Filed: R	TN/LiveScan Number がんろみのこと	Complaint/Incident Number BCE-210274
Defendant Name:	First: STACEY		.ast; 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

			(Signature of Affiant)
Sworn to me and subscribed before me this	5 HL day of	. TUNE	2022
6/15/2022 Date	MC 1	, Mag	listerial District Vudge
My commission expires first Monday of January,	2028		DFA)
•			WINDSHILLING