

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: PHILADELPHIA

Magisterial District Number: CJC
MDJ: Hon. PHILA ARRAIGNMENT COURT
Address: 1301 FILBERT STREET
PHILADELPHIA, PA 19107

Telephone: (215)686-7000



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

KAHIR
First Name

SUMOR
Middle Name

TEAGLE
Last Name

1410 S. 52ND St., Apt 1, Philadelphia, PA 19146

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed 9/28/2024	OTN/LiveScan Number	Complaint Number FCE220013	Incident Number FCE220013	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 04/07/2002	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	
First Name		Middle Name	Last Name		Gen.
AKA N/A					
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)					
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)					
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)	
FBI Number 2MEEMM5KK	MNU Number			175	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.	
Fingerprint Classification:				5	10

DEFENDANT VEHICLE INFORMATION

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

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because:

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

SDAG Helen Park
(Name of the attorney for the Commonwealth)

approved electronically
(Signature of the attorney for the Commonwealth)

9/13/2024
(Date)

I, SA TARYN LIEBTAG
(Name of the Affiant)

BADGE #812
(PSP/MP/OTC -Assigned Affiant ID Number & Badge #)

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

PA0222400
(Police Agency ORI Number)

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

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

in PHILADELPHIA County [51]
(County Code)

on or about MARCH 31, 2022 - JULY 5, 2022



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

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

<input checked="" type="checkbox"/>	1	3921	a	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

Statute Description (include the name of statute or ordinance): **ATTEMPT: THEFT BY UNLAWFUL TAKING**

Acts of the accused associated with this Offense: A person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof. On various dates on or around May 21, 2022 and July 5, 2022, Kaahir Teagle made excessive payments to his PA Department of Revenue myPATH account to engage in a fraud scheme which triggered automatic refunds. Payments were made from accounts that Teagle did not have authority to use or that he knew did not have the required funds. On two occasions, around June 27, 2022 and July 1, 2022, refund checks were issued to Teagle totaling over \$1 million, but his scheme was discovered and Teagle was unable to cash these two checks.

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

<input type="checkbox"/>	2	3922	a1	of the	TITLE 18	1	F1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

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

Acts of the accused associated with this Offense: A person is guilty of theft if he intentionally obtains or withholds property of another by deception. A person deceives if he intentionally: creates or reinforces a false impression. On various dates on or around May 21, 2022 and July 5, 2022, Kaahir Teagle made excessive payments to his PA Department of Revenue myPATH account to engage in a fraud scheme which triggered automatic refunds. Teagle deceived the PA Department of Revenue by creating a false impression that the payments were legitimate and that he either had the authority to use bank accounts, or that the accounts had sufficient funds to cover the payments. On two occasions, around June 27, 2022 and July 1, 2022, refund checks were issued to Teagle totaling over \$1 million. Once the scheme was discovered, Teagle was not able to cash these two checks.

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

<input type="checkbox"/>	3	4120	N/A	of the	TITLE 18	3	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

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

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

Acts of the accused associated with this Offense: A person commits the offense of identity theft of another person if he possesses or uses, through any means, identifying information of another person without the consent of that other person to further any unlawful purpose. On or around May 21, 2022 through July 5, 2022, Kaahir Teagle used the personal identifying information and bank account information of three (3) individuals without their consent to further his fraud scheme.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

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

<input type="checkbox"/>	4	3921	a1	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

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

Acts of the accused associated with this Offense: A person is guilty of theft if he unlawfully takes, or exercises unlawful control over, movable property of another with intent to deprive him thereof. Kaahir Teagle made excessive payments to his PA Department of Revenue myPATH account to engage in a fraud scheme which triggered automatic refunds. On various dates between June 14, 2022 and June 30, 2022, Teagle cashed four (4) checks totaling \$13,030.65, unlawfully taking control over movable property (USC) which belonged to the PA Department of Revenue, with intent to deprive them thereof.

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

<input type="checkbox"/>	5	3922	a1	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

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

Acts of the accused associated with this Offense: A person is guilty of theft if he intentionally obtains or withholds property of another by deception. A person deceives if he intentionally creates or reinforces a false impression. Kaahir Teagle made excessive payments to his PA Department of Revenue myPATH account to engage in a fraud scheme which triggered automatic refunds. Teagle created the false impression that the payments were legitimate and that he either had the authority to use bank accounts, or that the accounts had sufficient funds to cover the payments. On various dates between June 14, 2022 and June 30, 2022, Teagle cashed four (4) checks totaling \$13,030.65, thereby unlawfully obtaining PA Department of Revenue property (USC) by deception.

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

<input type="checkbox"/>	6	3925	a	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

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

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

Acts of the accused associated with this Offense: A person is guilty of theft if he intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen. Kaahir Teagle made excessive payments to his PA Department of Revenue myPATH account to engage in a fraud scheme which triggered automatic refunds. Payments were made from accounts that Teagle did not have authority to use or that he knew did not have sufficient funds. On various dates between June 14, 2022 and June 30, 2022, Teagle cashed four (4) checks totaling \$13,030.65, intentionally receiving and retaining movable property (USC) of the PA Department of Revenue, knowing that it had been stolen.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	7	4902	a	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): PERJURY									
Acts of the accused associated with this Offense: A person is guilty of perjury, if in any official proceeding he makes a false statement under oath or equivalent affirmation, or swears or affirms the truth of a statement previously made, when the statement is material and he does not believe it to be true. On March 31, 2022, Kaahir Teagle committed perjury when he filed a state personal income tax return that contained information that he knew was not true.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	8	4911	a	of the	TITLE 18	1	F3		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): TAMPERING WITH PUBLIC RECORDS									
Acts of the accused associated with this Offense: A person commits an offense if he knowingly makes a false entry in, or false alteration of, any record, document or thing belonging to, or received or kept by, the government for information or record, or required by law to be kept by others for information of the government. On March 31, 2022, Kaahir Teagle filed a state personal income tax return that contained false information.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	9	4904	a1	of the	TITLE 18	1	M2		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): UNSWORN FALSIFICATION TO AUTHORITIES									
Acts of the accused associated with this Offense: A person commits an offense if, with intent to mislead a public servant in performing his official function, he makes any written false statement which he does not believe to be true. On March 31, 2022, Kaahir Teagle filed a state personal income tax return that contained false statements which he knew were not true.									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	10	4105	a1	of the	TITLE 18	1	M2	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): BAD CHECKS								
Acts of the accused associated with this Offense: A person commits an offense if he issues or passes a check or similar sight order for the payment of money, knowing that it will not be honored by the drawee. On June 9, 2022, Kaahir Teagle submitted a payment from his personal bank account to his personal myPATH account in the amount of \$700.00, which he knew would not be honored.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	11	4105	a1	of the	TITLE 18	1	M3	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): BAD CHECKS								
Acts of the accused associated with this Offense: A person commits an offense if he issues or passes a check or similar sight order for the payment of money, knowing that it will not be honored by the drawee. On June 26, 2022, Kaahir Teagle submitted a payment from his personal bank account to his personal myPATH account in the amount of \$125.00, which he knew would not be honored.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	12	4106	a1(ii)	of the	TITLE 18	31	F3	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description (include the name of statute or ordinance): ACCESS DEVICE FRAUD								
Acts of the accused associated with this Offense: A person commits an offense if he uses an access device to obtain or in an attempt to obtain property or services with knowledge that the access device was issued to another person who has not authorized its use. On thirty-one (31) occasions on or around May 21, 2022 through July 5, 2022, Kaahir Teagle used access devices to make excessive payments to his PA Department of Revenue myPATH account in order to further a fraud scheme which triggered automatic refunds. The access devices were issued to individuals who did not give Teagle the authority to use them.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

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 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 than non-confidential information and documents.

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

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

September 20
(Date)

2024
(Year)


(Signature of Affiant)

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

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

(Magisterial District Court Number)


(Issuing Authority)

9/20/24

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Special Agent Taryn Liebttag, #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 since July 2020. As a Special Agent in the Financial Crimes Section, your Affiant's primary duties are to investigate crimes, interview 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, your Affiant 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

In September 2022, Office of Attorney General Special Agent Cam Long met with a representative from the Pennsylvania Department of Revenue (DOR) regarding allegations of theft of public funds through fraudulent refund requests made to the DOR. It was relayed that on July 6, 2022, the DOR discovered an overpayment scheme involving the personal income tax account (80014809982) registered to Kaahir Teagle ("TEAGLE").

On March 31, 2022, TEAGLE filed a 2021 personal income tax return using SSN1 (See Confidential Information Form), email address gunna2savage@icloud.com, and cell phone 267-995-6752. The return claimed TEAGLE's gross compensation was \$21,445.00, and based on amounts he submitted for gambling winnings, excessive withholdings, and payments made, he was owed a refund \$20,533 by the Commonwealth. The DOR fraud department flagged this return and on May 12, 2022, the claims of fictitious payments and excessive (unsupported) withholdings were removed. After the adjustments were made, it was determined that TEAGLE was not owed a refund of \$20,533, but instead owed the Commonwealth \$569.00.

Additionally, the DOR found that between May 21, 2022 and July 5, 2022, thirty-three (33) fraudulent electronic fund transfer (EFT) payments were submitted as credits to TEAGLE's myPATH account. Although many of the payments were initially processed and posted to the account, they were later reversed due to insufficient funds, an inability to locate the account, or because the account had been flagged by the financial institution of fraudulent activity. Before the payments were reversed, the software used by the DOR calculated them as overpayments on TEAGLE's personal tax return. As he made additional payments, the software continued to generate refund checks in order to balance the account. The Department of Treasury subsequently issued the following six (6) personal income tax refund checks from June 10, 2022 through June 27, 2022 totaling approximately \$1,046,986.20:

Account	Period	Refund	Requested	Request Amount	Refund Type	Refund Stage	Refund Status
Personal Income Tax	12/31/2021	R4957818		610.05	Personal Income Tax Refund	Approved	Redeemed
Personal Income Tax	12/31/2021	R4860912		250.52	Personal Income Tax Refund	Approved	Redeemed
Personal Income Tax	12/31/2021	R4910458		1,116.75	Personal Income Tax Refund	Approved	Redeemed
Personal Income Tax	12/31/2021	R5074155		11,053.33	Personal Income Tax Refund	Approved	Redeemed
Personal Income Tax	12/31/2021	R5339530		5,036.70	Personal Income Tax Refund	Reversed	Treasury Rejected
Personal Income Tax	12/31/2021	R5271419		1,028,918.85	Personal Income Tax Refund	Rejected	Rejected



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/28/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

The final refund check for \$1,028,918.85 was caught by a DOR fraud department manager and rejected before the check was sent out. The previous five (5) checks were all mailed to TEAGLE's documented residence at 1410 S. 52nd St., Apartment 1, Philadelphia, PA, 19143. Although the refund check in the amount of \$5,036.70 was mailed to TEAGLE, the DOR was able to place a stop payment on this check before it could be cashed. The previous four (4) refund checks totaling \$13,029.65 were cashed at various cash centers located in the Philadelphia area and are broken down below:

Check Date	Check #	Check Amount
June 10, 2022	2398 0011110626	610.05
June 16, 2022	2398 0011120433	250.52
June 21, 2022	2398 0011127876	1,116.75
June 27, 2022	2398 0011155424	11,053.33
	TOTAL	\$ 13,030.65

III. INVESTIGATION

Your Affiant received copies of the four (4) cancelled checks, reviewed the backs of the checks, and compared the signatures on them to that of the signature on TEAGLE's PA Identification Card. Your Affiant found that each check appears to have been endorsed by TEAGLE.

SA Long visited each of the below cash centers where the checks were cashed and obtained documentary and photo evidence related to the cashing of each of the four (4) checks:

- Ace Cash Express - 6137 Woodland Ave., Philadelphia, PA 19142
- United Check Cashing - 1123 S. Broad St., Philadelphia, PA 19147
- Whitman Check Cashing - 2700 S. Randolph St., Philadelphia, PA 19148

Your Affiant reviewed these records, which show TEAGLE's PA Identification Card (34046528) was used for identification purposes at all three (3) cash centers. Whitman Check Cashing and United Check Cashing provided copies of TEAGLE's ID and Ace Cash Express provided customer information that included TEAGLE's ID card number. Additionally, all three (3) Cash Centers provided the last four digits of TEAGLE's social security number (3962) and surveillance images of an individual consistent with the physical appearance of TEAGLE cashing the checks.

Your Affiant reviewed Philadelphia Juvenile Probation global positioning system (GPS) tracking information for TEAGLE, and compared the dates/times of when TEAGLE cashed the fraudulent checks in and around the city of Philadelphia with the GPS information received from Philadelphia Juvenile Probation. GPS information was not available for June 23, 2022, the day the check for \$1,116.75 was cashed at Ace Cash Express, but was available for the other days. After reviewing the records, your Affiant discovered the following:

- According to documents received from Whitman Cash Checking, TEAGLE cashed a check for \$610.05 on June 14, 2022, at 4:16 PM. GPS information from that day showed that at 4:14 PM, TEAGLE's monitor hit on 2702 S. Randolph St. and 530 W. Oregon Ave., Philadelphia, PA 19148. According to Google Maps, these locations are both less than 175 feet from Whitman Cash Checking.
- According to documents received from United Check Cashing, TEAGLE cashed a check for \$250.52 on June 18, 2022, at 7:03 PM. GPS information from that day showed that at 7:04 PM, TEAGLE's monitor hit on 1100 S. Broad St. and 1109 S. Broad St., Philadelphia, PA 19146. According to Google Maps, these locations are both less than 500 feet from United Check Cashing.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint/Incident Number
	9/20/2024		FCE220013
Defendant Name:	First:	Middle:	Last:
	KAAHIR	SUMOR	TEAGLE

- According to documents received from United Check Cashing, TEAGLE cashed a check for \$11,053.33 on June 30, 2022, at 9:19 AM. GPS information from that time was unavailable, but at 9:36 AM, TEAGLE's monitor hit on 1100 S. Broad St. and 1118 S. Broad St., Philadelphia PA 19146. According to Google Maps, these locations are both less than 300 feet from United Check Cashing.

The DOR provided information and records for the thirty-three (33) EFT payments to TEAGLE's account including dates of payments, amounts, and routing and account numbers. Although most of the payments initially posted to the myPATH account, they were later reversed due to insufficient funds, an inability to locate the account, or because of fraudulent activity flagged by the financial institution. The payments came from four (4) financial institutions – Go2Bank (owned by Green Dot Bank), Citizens Bank, American Heritage Federal Credit Union, and Sutton Bank. SA Long obtained search warrants for each of the financial institutions and was able to determine who the account holders were for each.

IV. ACCOUNT #1 – CITIZENS BANK

According to DOR records, between May 21, 2022 and July 5, 2022, sixteen (16) payments totaling \$73,125.19 were made to TEAGLE's myPATH account from Citizens Bank account FAN2. Each payment was later reversed – after the first few payments, the account holder notified Citizens Bank that the charges were not authorized. The account was frozen and payment was stopped on all future charges. The payments were as follows:

5/21/2022 - \$610.00	6/23/2022 - \$200.00
5/27/2022 - \$609.19	6/23/2022 - \$200.00
5/28/2022 - \$160.00	6/23/2022 - \$200.00
5/30/2022 - \$160.00	6/23/2022 - \$200.00
6/2/2022 - \$61.00	6/25/2022 - \$125.00
6/3/2022 - \$300.00	6/27/2022 - \$20,000.00
6/13/2022 - \$30.00	7/2/2022 - \$50,000.00
6/14/2022 - \$170.00	7/5/2022 - \$100.00

SA Long and DOR SA Felicia Hatton interviewed [REDACTED] and [REDACTED], account holders for FAN2. They identified the payments from their account to the PA Department of Treasury as unauthorized, adding that after they notified Citizens Bank of the suspicious activity, their account was closed.

V. ACCOUNT #2 – Go2Bank

According to DOR records, on May 23, 2022, two (2) payments totaling \$70,600.00 were made to TEAGLE's myPATH account from Go2Bank account FAN3. Each payment was eventually reversed due to insufficient funds in the account. The payments were as follows:

5/23/2022 - \$600.00
5/23/2022 - \$70,000.00

Special Agents from the Attorney General's Office interviewed [REDACTED], listed as the account holder for FAN3. [REDACTED] was unfamiliar with the account and said that she had not opened an account with that bank. She said that she had an intimate personal relationship with TEAGLE and he knew her personal identifying information including her DOB and SSN. He had previously asked her if he could open an account in her name and she said she told him no. After the interview, she ran a check on her credit and informed Agents that she believed TEAGLE had opened up an unspecified number of additional accounts in her name without her authorization.

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 9/29/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

VI. ACCOUNT #3 – AMERICAN HERITAGE FEDERAL CREDIT UNION

According to DOR records, between June 2, 2022 and July 1, 2022, thirteen (13) payments totaling \$1,021,351.00 were made to TEAGLE's myPATH account from American Heritage Federal Credit Union account FAN4. Each payment was eventually reversed as the account could not be located. The payments were as follows:

6/2/2022 - \$61.00	6/18/2022 - \$2,000.00
6/3/2022 - \$500.00	6/23/2022 - \$200.00
6/9/2022 - \$3,000.00	6/25/2022 - \$125.00
6/14/2022 - \$30.00	6/26/2022 - \$125.00
6/15/2022 - \$10,000.00	7/1/2022 - \$1,000,000.00
6/15/2022 - \$5,000.00	7/1/2022 - \$100.00
6/17/2022 - \$210.00	

Your Affiant and SA Long interviewed [REDACTED], the account holder for FAN4. [REDACTED] was unfamiliar with the payment activity and could not have authorized the charges since that particular account was closed before the charges were attempted. [REDACTED] explained that due to fraudulent activity involving that account around April 2022, American Heritage shut down the account.

VII. ACCOUNT #4 – SUTTON BANK

According to DOR records, on June 9, 2022 and June 26, 2022, two (2) payments totaling \$825.00 were made to TEAGLE's myPATH account from Sutton Bank account FAN1. Each payment was eventually reversed due to insufficient funds. The payments were as follows:

6/9/2022 - \$700.00
6/26/2022 - \$125.00

A search warrant served on Sutton Bank returned records showing that the account was opened on March 31, 2022 - the same day TEAGLE's personal tax return was filed. TEAGLE's name, DOB, SSN1, home address, email address gunna2savage@icloud.com, and cell phone number 267-995-6752 were used to open the account.

VIII. CONCLUSION

On March 31, 2022, TEAGLE submitted a state personal income tax return which he knew contained false information. Then, on various dates from around May 21, 2022 through July 5, 2022, he engaged in a fraud scheme in which he used the bank accounts of others to make overpayments to his Department of Revenue myPATH account. He also used his personal bank account to further the scheme, knowing that the payments from his account would not be honored. The overpayments resulted in the Department of Revenue issuing him multiple refund checks. TEAGLE cashed four checks before the Department of Revenue discovered the scheme.

Based upon the aforementioned facts, Affiant respectfully requests that an arrest warrant be issued for Kaahir TEAGLE, charging him with 18 Pa.C.S.A.:



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 9/20/2024	OTN/LiveScan Number	Complaint/Incident Number FCE220013
Defendant Name:	First: KAAHIR	Middle: SUMOOR	Last: TEAGLE

§3921(a) Theft by Unlawful Taking: Attempt (F1) – 1 count
§3922(a)(1) Theft by Deception: Attempt (F1) – 1 count
§4120 Identity Theft (F3) – 3 counts
§3921(a) Theft by Unlawful Taking (F3) – 1 count
§3922(a)(1) Theft by Deception (F3) – 1 count
§3925(a) Receiving Stolen Property (F3) – 1 count
§4902(a) Perjury (F3) – 1 count
§4911(a)(1) Tampering with Public Records (F3) – 1 count
§4904(a)(1) Unsworn Falsification to Authorities (M2) – 1 count
§4105(a)(1) Bad Checks (M2) – 1 count
§4105(a)(1) Bad Checks (M3) – 1 count
§4106(a)(1)(ii) Access Device Fraud (F3) – 31 counts

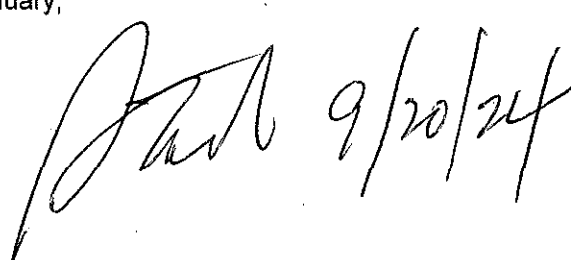
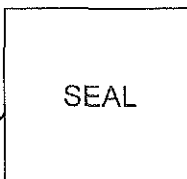
I, SA TARYN LIEBTAG, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

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

 #812
(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____
_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,

 9/20/24  SEAL