## COMMONWEALTH OF PENNSYLVANIA COUNTY OF: ALLEGHENY

MDJ: Hon. JAMES J HANLEY, JR. Magisterial District Number: 05-2-36 Address: 4301 MURRAY AVENUE LOWER LEVEL REAR PITTSBURGH, PA 15217



## **POLICE CRIMINAL COMPLAINT** COMMONWEALTH OF PENNSYLVANIA VS.

(NAME and ADDRESS):

PATRICK First Name

**VEREB** Last Name

SR

ROY

Middle Name

Phone: 412.521.7782					5108 SECOND AVE. PITTSBURGH, PA 15207									
					NCIC E	xtradit	ion Code Type							
Felony - Extradition Sur Distance:	rroundi	ng States On	İy											
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I, APRIL-NOELLE	E CA!	MPBELL			19991									
(Name of the Affian							(PSP/MPOETO	C -Assign	ed Affiant II	Number 8	& Badge	=#		
of ATTORNEY GE	NER	RAL					PA0222400							185 X
(Identify Department or Agency Represented and Political Subdivision)  (Police Agency ORI Number)  do hereby state: (check appropriate box)  1. x   accuse the above named defendant who lives at the address set forth above   accuse the defendant whose name is unknown to me but who is described as														
l accuse the therefore, o						esigna	ation or nicknar	me are ı	unknown	to me ar	nd who	om I have,		
						aith of Pennsylvania at301				PITTSBURGH_CITY ace-Political Subdivision)				
In Allegheny Co	ounty	,	O2 (County C	iode)			on or about	01/01	/2021	0:01		· ·		



Docket Number:	Date Filed:	OTN/LiveScan Number		Complaint/Incident Number
		R 852222-0		ASAP-1034674/BCW250025
Defendant Name	First: PATRICK	1	Middle: ROY	Last: VEREB

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. 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.)

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3925(a) and 3903 (a)(1).

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Inchoate Attempt Offense 18 901 A			1 1	icitation 902 A		Conspiracy 18 903			
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The actor, in the course of business, sold, offered or exposed for sale, or delivered less than the represented quantity of any commodity or service, namely performing pet cremations during 2021, in violation of 18 Pa.C.S.§4107(a)(2).

The actor, in the course of business, sold, offered or exposed for sale, or delivered less than the represented quantity of any commodity or service, namely performing pet cremations during 2022, in violation of 18 Pa.C.S.§4107(a)(2).

The actor, in the course of business, sold, offered or exposed for sale, or delivered less than the represented quantity of any commodity or service, namely performing pet cremations during 2023, in violation of 18 Pa.C.S.§4107(a)(2).

The actor, in the course of business, sold, offered or exposed for sale, or delivered less than the represented quantity of any commodity or service, namely performing pet cremations during 2024, in violation of 18 Pa.C.S.§4107(a)(2).

Inchoate Attempt Offense 18 901 A					Solicitation 18 902 A			Conspiracy 18 903			
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Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		
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Defendant Name	First:	Middle		Last:		
	PATRICK	ROY		VEREB		

- 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 is comprised of the preceding page(s) numbered through
- 5. I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than nonconfidential 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.)

04/28/2025 (Signature of Affiant) (Date) R(L 28, 2021) I certify that the complaint has been properly completed and verified. AND NOW, on this date An affidavit of probable cause must be completed before a warrant can be issued. (Magisterial District Court Number (Issuing Authority SEAL MAGISTERIAL DISTRICT JUDGE MAGISTERIAL DISTRICT 05-2-36 MY COMMISSION EXPIRES ON THE

FIRST MONDAY IN JANUARY, 2030

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Defendant Name	First:		/iddle:	Last:
	PATRICK	F	ROY	VEREB

## **AFFIDAVIT of PROBABLE CAUSE**

#### 1. WHEN:

a) Date when Affiant received information:

2/4/2025

b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:

#### 2. **HOW**:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
   Information received from information received from ex-employees, defendant's admissions, and personal observations.
- b) How the source of information knows this particular person committed the crime:

Personal Observations

c) How both Affiant and/or source of information knows that a particular crime has been committed: Information received from information received from ex-employees, defendant's admissions, and personal observations.

### 3. WHAT CRIMES:

18 3925 A RECEIVING STOLEN PROPERTY

18 4107 A4 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 4107 A4 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 4107 A2 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 3922 A1 THEFT BY DECEPTION

18 4107 A2 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 4107 A2 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 4107 A4 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 4107 A4 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

18 4107 A2 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES

## 4. WHERE CRIME(S) COMMITTED:

5106-5108 SECOND AVE, PITTSBURGH, PA. 15207

#### 5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.

Source has given information in the past which has led to arrest and/or conviction

X Defendant's reputation for criminal activity

This source made declaration against his/her penal interest to the above offense

Affiant and/or other Police Officers corroborated details of the information



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Your Affiant, Aprill-Noelle Campbell, is employed as a Special Agent for the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations Section and is a member of the FBI's Western Pennsylvania Violent Crimes Against Children Task Force. Your Affiant has been employed as an Agent for 9 years as a Certified Forensic Computer Examiner, and as an Agent in Criminal Investigations. Prior to that, your Affiant was employed for 21 years as a City of Pittsburgh Police Officer. The last 11 years with the PBP was as a detective in the Sex Assault / Child Abuse Unit. In this capacity, your Affiant received training in investigations, interrogations, and computer forensics and made numerous arrests which led to successful criminal prosecutions.

Your Affiant, Austin J. Kaminski, is presently employed as a Special Agent for the Pennsylvania Office of Attorney General (PA OAG), Bureau of Criminal Investigations (BCI). Previously, your affiant worked in the Medicaid Fraud Control Section of the PA OAG as both a Fraud Analyst and a Special Agent for six years. As part of the training of becoming a Special Agent within the PA OAG, your affiant attended the Commonwealth Investigators Training Program (CITP). Training at CITP included topics such as Pennsylvania criminal statutes, criminal procedure, report writing, search and seizure, interview and interrogation, use of force, and defensive tactics among others. As a Special Agent in both the BCI and MFCS, your affiant has conducted or assisted in investigations of numerous crimes including theft, healthcare fraud, drug diversion and distribution, firearms violations, sexual assault, and homicide. Your affiant has employed numerous investigative methods and techniques including conducting physical and electronic surveillance, interviewing of witnesses and suspects, testifying before a grand jury, and the execution of multiple search warrants; with numerous investigations resulting in the arrest and successful prosecution of suspects.

As Agents of the PA OAG, your affiants are empowered by law to make arrests and execute search warrants for various offenses arising out of violations of the Crimes Code (Title 18) in addition to violations of the Public Welfare Code (Title 62) and the Controlled Substance, Drug, Device and Cosmetic Act (Title 35).

#### PROBABLE CAUSE

On January 29, 2025 your Affiants were assigned to a case involving Patrick Roy Vereb (Vereb) and Eternity Pet Memorial (EPM) located at 5106/5108 Second Ave. Pittsburgh, PA. 15207. During the course of the investigation, your affiants obtained records from numerous veterinarian offices (vet), EPM, and a crematorium where the animals were to be cremated. Based on the review of the records it was determined that Vereb charged over 6,500 pet owners totaling \$657,517.00 for cremations and other services never rendered.

Your Affiants spoke with former employees of EPM whose names and addresses are known to your Affiants and will be available for court proceedings. The employees were hired by Patrick Vereb to work for his EPM business with various duties. Two of the employees assisted with meeting clients and handling business paperwork. They told your Affiants the pet cremations came from two different sources, veterinarian (vet) practices and individuals. EPM had regular vet clients in which a driver would pick up animal remains and drop off ashes on set days of the week. Pet owners would pay the vet for the services and the vet would pay EPM. Pet owners could bring their pets directly into EPM's Hazelwood or Natrona Heights offices. If the pet was dropped off in Natrona Heights, one of the employees or Vereb himself would bring the pet to Hazelwood first, then it was taken to the crematorium. Pet owners that dealt directly with EPM were asked to pay the entire fee upfront.

Vereb instructed employees to explain the different packages available, including common burial services, private cremations, and paw prints and fur clippings of the animal. The employees said Vereb told them to stress that they only do "private" cremation as opposed to communal cremations. Communal cremations involve multiple animals being cremated and ground down together so the client receives mixed ashes in return. The employees said that pet owners often asked about getting their own pet's remains back. The employees were instructed by Vereb to explain the difference and to tell them that once EPM receives an animal, it will be given a tag with the pet's name and the family's last name on it. Then, at the crematorium, the animal will get a metal tag with a number to further ensure the remains are correctly marked. One employee also said that a signed Cremation Certificate was



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given to pet owners along with the ashes, which further reinforced the belief that the ashes were the remains of their actual pets. If the family was interested in burial services, they were told that the animals were buried in a cemetery with other animals. Once the animals were dropped off in Hazelwood, "toe tags" were attached to the bag containing the pet. The tag would have the animal's name, the family's last name, the vet's name, and a weight range for the animal. The animals would then be placed on various carts and surfaces in the funeral home's basement to await transport. Vereb would then hand write "Daily Lists" with the animals' names for each transport date to the crematorium. When the remains were returned to EPM, an employee entered the tag number that had been given to the animal at the crematorium into the spreadsheet.

Vereb would sometimes have employees write the "Daily Lists" and Vereb told staff that no animals under 60 lbs, were to be taken to the crematorium. Vereb told his staff that he would take the small pets to a different crematorium.

In late July and early August of 2024, employees became suspicious of Vereb's practices. Employees told investigators that they noticed that few animals listed on the spreadsheet as being marked for cremation had tag numbers from the crematorium and that none of the animals under 30 lbs. had tag numbers. One of the employees then began to compare the hand-written transportation "Daily Lists" with the spreadsheet and saw that Vereb would take in far more numbers of animals than what he was cremating, but he was still charging for the cremation process and providing ashes to the vets and to the individual pet owners for animals that were not actually cremated. The employee also saw that there were often times when large dogs were supposed to be common burials, but would be cremated instead. Vereb had instructed the employees to not write "common" next to these pets' names when they would write out the transport list for the crematorium, but to circle their names instead. A subsequent interview of an employee at the crematorium confirmed that if animals were listed as "common," the animals would be cremated together and ashes would not be returned to EPM. As a result of altering these lists, it allowed Vereb to received ashes which he could then redistribute to pet owners under the guise that the pet owners were receiving their pet's ashes.

On February 6, 2025, your Affiants interviewed Vereb at EPM. During the interview, Vereb admitted that there was a problem with the process of cremating the pets, claiming the crematorium took too long to return the remains to EPM. Vereb said that "sometimes" pets' remains went back to the vet and the ashes were not the ashes of that particular pet. Vereb reluctantly agreed with your Affiant that pet owners were not always getting their specific pets' actual ashes back. Vereb admitted that if he didn't have ashes for a pet, he gave the owners ashes from another animal to "make them feel good for the day if nothing else" and he admitted to using the "leftover" ashes of other pets to pass off as those of the pets who were not cremated. Vereb said he would also use the ashes of other pets if the animals had not yet been processed. In essence, if an animal was at the crematorium for over a week, Vereb would use the ashes he had on hand to cover for that owner's pet. Then, when that animal's actual ashes were returned to Vereb, he would use them for another pet.

Vereb was asked why he would send "commons" to be cremated if the crematorium couldn't even keep up with the demand for the pet owners who wished to have their pets cremated. Vereb admitted that sometimes it was more convenient to cremate the animal instead of burying them or he would do it to free up space. When asked where he buries the "commons," Vereb admitted to not using these pet cemeteries "in a while" and that he instead dumped the animals in a landfill. Vereb admitted he lied to the pet owners and told them that their pets were buried with other animals. Vereb was then asked what he would tell the pet owners about their pet's ashes. Vereb admitted that he and staff stated that the pet owners got their pet's ashes back, Vereb added: "don't think that I think what I was doing was right."

Your Affiants obtained invoices from the landfill utilized by Vereb. All of the invoices indicated that the waste being dumped was "animal carcass" and they were all signed by "Patrick Vereb." The invoices also listed the gross and net weight of the load. Your Affiant added the total net weights for the animal carcasses brought to the landfill for each year for 2021 (June through September), 2022, 2023, and 2024. Your Affiant then obtained the total weights for the animals which were marked as "common" on EPM's spreadsheets and which were not cremated. An analysis of these records revealed that between 2021-2024, 490 pets were to be



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"buried" and thus taken to the landfill. The total weight for those 490 pets was 26,945 pounds. However, the total weight on the landfill receipts for "animal carcasses" that were actually dumped by Vereb in the landfill was 170,451 pounds. Thus, these records indicate that an incredibly large number of animals were being dumped rather than being cremated as promised.

Vereb and EPM had vet clients in Allegheny, Armstrong, Washington, and Westmoreland counties. EPM contracted with 19 vets, and 11 of those vet practices confirmed that EPM was hired to provide private and common cremations for their clients. Voluminous records were recovered from EPM, including invoices and proof of payments for these services "provided" to these vet practices and their clients.

EPM employees created and maintained a spreadsheet of these records, which was obtained by your Affiant via search warrant. The invoices sent to the vets contained the pets' names, date of death, and cost of services. The master spreadsheet, which was more detailed, also contained a date the pet was reported to have been sent to the crematorium, the tag number given to the animal by the crematorium staff and an indication whether the animal was a private (P) or common (C) burial.

During the course of this investigation, your Affiants also obtained ledger books created by the staff at the crematorium. The books were comprised of entries for the middle of January 2021 until November of 2024 and they listed the date of cremation along with the animals' names, weight ranges, the tag numbers (in numerical order) issued by the crematorium, and initials indicating the source of the remains (ex. "E.T." for Eternity Pet).

Your Affiants reviewed the above documentation and determined how many animals weighting less than 30 lbs were cremated for EPM. Only 29 animals under 30 lbs, were actually cremated between 2021 and September of 2024. However, EPM's records revealed that thousands of animals under 30 lbs, were actually brought to EPM for cremation during this same time frame.

Your Affiants then compared all of the invoices obtained from eleven (11) vets/businesses that your Affiants confirmed utilized EPM, to EPM's master spreadsheet, the "Daily Lists" for transportation to the crematorium, and records from the crematorium. This review revealed that dates were entered on the master spreadsheet for when the animals' remains were taken to the crematorium; however, the crematorium records, as well as the "Daily Lists" for transportation, revealed that the animals were not actually transported there. This was confirmed via the cremation records and the "Daily Lists" for transportation.

Business #1 – Total number of animals sent to EPM for cremation that were not cremated: 926 Total Payments from Business #1 to EPM: \$84,382.00

Business #2 - Total number of animals sent to EPM for cremation that were not cremated: 174
Total Payments from Business #2 to EPM: \$16,255.00

Business #3 - Total number of animals sent to EPM for cremation that were not cremated: 623 Total Payments from Business #3 to EPM: \$60,774.00

Business #4 - Total number of animals sent to EPM for cremation that were not cremated: 209 Total Payments from Business #4 to EPM: \$20,410,00

Business #5 - Total number of animals sent to EPM for cremation that were not cremated: 63 Total Payments from Business #5 to EPM: \$9,210.00

Business #6 - Total number of animals sent to EPM for cremation that were not cremated: 844 Total Payments from Business #6 to EPM: \$79,594.00

Business #7 - Total number of animals sent to EPM for cremation that were not cremated: 722 Total Payments from Business #7 to EPM: \$69,353.00

Business #8 - Total number of animals sent to EPM for cremation that were not cremated: 386 Total Payments from Business #8 to EPM: \$36,549.00

Business #9 - Total number of animals sent to EPM for cremation that were not cremated: 264



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Total Payments from Business #9 to EPM: \$23,747.00

Business #10 - Total number of animals sent to EPM for cremation that were not cremated: 271

Total Payments from Business #10 to EPM: \$26,159.00

Business #11 - Total number of animals sent to EPM for cremation that were not cremated: 745

Total Payments from Business #11 to EPM: \$71,051.00

Your Affiants had also obtained files for "walk-in" clients for 2020, 2021, and 2022 (only for last names ending in E through Z). The files for 2020 were obtained, but due to the crematory records only beginning in 2021, they were unhelpful to this investigation. The "walk-in" files consisted of a worksheet filled out by EPM employees with the pet owners' information along with the deceased pets' data and services purchased. Your Affiant reviewed every file and compared it to EPM's spreadsheet and the crematorium books. During the review, your Affiants noted that there were several large "common" animals which were cremated, even though the animal's owners paid for common burial.

The total number of "walk-in" pet owners' animals sent to EPM for cremation in 2021 that were not cremated: 674. The total number of "walk-in" pet owners' animals sent to EPM for cremation in 2022 that were not cremated: 601.

Total payments from individuals to EPM: \$160,033.00

The above data was determined by comparing the pets' names and dates of death from Vereb's spreadsheets to pets' names on EPM's invoices for each business, and to pets' names and cremation dates from the crematorium's burn records

The following is the amount charged by Vereb for services not provided to his clients:

2021: \$174,264.00 2022: \$214,159.00 2023: \$149,955.00 2024: \$119,139.00 TOTAL: \$657,517.00

Based on the above information, your Affiants believe there is probable cause to support the listed charges and request an arrest warrant to be issued for Patrick Vereb.



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I, APRIL-NOELLE CAMPBELL , BEING DULY SWORN THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT AF KNOWLEDGE, INFORMATION AND BELIEF.		E LAW, DEPOSE AND SAY ECT TO THE BEST OF MY	
I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-COM	THAT REQUIRE FILI	NG CONFIDENTIAL IATION AND DOCUMENTS.	
	(Signature of Affiant)		
	_	• •	
Sworn to me and subscribed before me this day of	, FEPRIL	1028	
Sworn to me and subscribed before me this day of January JAMES J. HANLE'S THE DISTRIBUTION OF JAMES J. HANLE'S	, Magiste	erial District Judge	