

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY



POLICE
CRIMINAL COMPLAINT

Magisterial District Number: 05-0-03
 District Justice Name: Hon. Charles A. McLaughlin
 Address: 736 Brookline Blvd
 Pittsburgh, PA 15226
 Telephone: (412)343-1188

COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

NAME and ADDRESS

TWANDA D. CARLISLE
 2041 Sonny Street
 Pittsburgh, PA 15221

Docket No.: CR-3307
 Date Filed: 4-10-07
 OTN: K2468966

Defendant's Race/Ethnicity <input type="checkbox"/> White <input checked="" type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Native American <input type="checkbox"/> Hispanic <input type="checkbox"/> Unknown	Defendant's Sex <input checked="" type="checkbox"/> Female <input type="checkbox"/> Male	Defendant's D.O.B. 12/25/58	Defendant's Social Security Number	Defendant's SID (State Identification Number)
Defendant's A.K.A. (also known as)	Defendant's Vehicle Information Plate Number	State	Registration Sicker (MMYY)	Defendant's Driver's License Number State PA [REDACTED]
Complaint/Incident Number E-106-06	LiveScan Tracking Number	Complaint/Incident Number if other Participants	UCR/NEBIS Code	

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. Pa.R.Cr.P. 507.)

(Name of Attorney for Commonwealth-Please Print or Type) I, William Miller	(Signature of Attorney for Commonwealth) Detective, 7358	(Date)
(Name of Affiant-Please Print or Type) of D A INVESTIGATIONS	(Officer Badge Number/I.D.) PA 002013A	(Originating Agency Case Number (OCA)) E-106-06
(Identify Department or Agency Represented and Political Subdivision)	(Police Agency or Off. 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 is unknown to me and whom I have therefore designated as John Doe

with violating the penal laws of the Commonwealth of Pennsylvania at City of Pittsburgh
(Place-Political Subdivision)

in Allegheny County on or about 09/01/2003 to 11/28/2005

Participants were: (if there were participants, place their names here, repeating the name of the above defendant)

Darlene Durham, Dr. Lee Otto Johnson, Sheryl Pinson-Smith

Defendant's Name: Twanda D. Carlisle
Docket Number: CR-33-07



**POLICE
CRIMINAL COMPLAINT**

2. The acts committed by the accused were:
(Set forth a summary of the facts sufficient to advise the defendant of the nature of the offense charged. A citation to the statute allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section and subsection of the statute or ordinance allegedly violated.)

COUNT 1

Violation of Pennsylvania Public Official and Employee Ethics Act,
65 Pa. C.S. Section 1109(a) Statutory Felony

On or about September 12, 2003 through March 31, 2004, the Actor, hereby a public official, did engage in conduct that constituted a conflict of interest, to-wit: the Actor, in her capacity as an elected member of the City Council of the City of Pittsburgh, did use the authority of her office for the private pecuniary benefit of herself by diverting monies through Darlene Durham, belonging to the City of Pittsburgh in an amount approximating \$19,480.00, for her own personal benefit, in violation of the Public Official and Employee Ethics Act, Conflicts of Interest, [65 P.S. Section 1103(a) and Section 1109(a)], in violation of the Act of October 15, 1998, P.L. 729, No. 93, Section 1, as amended.

COUNT 2

Violation of Pennsylvania Public Official and Employee Ethics Act,
65 Pa. C.S. Section 1109(a) Statutory Felony

On or about April 7, 2004 through September 27, 2004, the Actor, hereby a public official, did engage in conduct that constituted a conflict of interest, to-wit: the Actor, in her capacity as an elected member of the City Council of the City of Pittsburgh, did use the authority of her office for the private pecuniary benefit of herself by diverting monies through Dr. Lee Otto Johnson, belonging to the City of Pittsburgh in an amount approximating \$10,475.00, for her own personal benefit, in violation of the Public Official and Employee Ethics Act, Conflicts of Interest, [65 P.S. Section 1103(a) and Section 1109(a)], in violation of the Act of October 15, 1998, P.L. 729, No. 93, Section 1, as amended.

COUNT 3

Violation of Pennsylvania Public Official and Employee Ethics Act,
65 Pa. C.S. Section 1109(a) Statutory Felony

On or about October 14, 2004 through October 3, 2005, the Actor, hereby a public official, did engage in conduct that constituted a conflict of interest, to-wit: the Actor, in her capacity as an elected member of the City Council of the City of Pittsburgh, did use the authority of her office for the private pecuniary benefit of herself by diverting monies through Sheryl Pinson-Smith, belonging to the City of Pittsburgh in an amount approximating \$13,205.00, for her own personal benefit, in violation of the Public Official and Employee Ethics Act, Conflicts of Interest, [65 P.S. Section 1103(a) and Section 1109(a)], in violation of the Act of October 15, 1998 P.L. 729, No. 93, Section 1, as amended.

COUNT 4

Theft by Deception, 18 Pa. C.S. Section 3922(a)(1)

The actor intentionally obtained or withheld property, namely, through accomplice Darlene Durham obtained or withheld monies in excess of \$2,000.00 approximating \$19,480.00 belonging to the City of Pittsburgh by creating or reinforcing a false impression, value, intention or other state of mind, in violation of 18 Pa.C.S. Section 3922(a)(1).

COUNT 5

Theft by Deception, 18 Pa. C.S. Section 3922(a)(1)

The actor intentionally obtained or withheld property, namely, through accomplice Dr. Lee Otto Johnson obtained or withheld monies in excess of \$2,000.00 approximating \$10,475.00 belonging to the City of Pittsburgh by creating or reinforcing a false impression, value, intention or other state of mind, in violation of 18 Pa.C.S. Section 3922(a)(1).

COUNT 6

Theft by Deception, 18 Pa. C.S. Section 3922(a)(1)

The actor intentionally obtained or withheld property, namely, through accomplice Sheryl Pinson-Smith obtained or withheld monies in excess of \$2,000.00 approximating \$13,205.00 belonging to the City of Pittsburgh by creating or reinforcing a false impression, value, intention or other state of mind, in violation of 18 Pa.C.S. Section 3922(a)(1).

COUNT 7

Criminal Conspiracy, 18 Pa.C.S. Section 903(a)(1)

The actor, with the intent of promoting or facilitating the crime(s) of Theft by Deception (18 Pa.C.S. Section 3922(a)(1)) conspired and agreed with Darlene Durham that they or one or more of them would engage in conduct constituting such crime(s) or an attempt or solicitation to commit such crime(s), and in furtherance thereof did commit an overt act in violation of 18 Pa.C.S. Section 903(a)(1).

COUNT 8

Criminal Conspiracy, 18 Pa.C.S. Section 903(a)(1)

The actor, with the intent of promoting or facilitating the crime(s) of Theft by Deception (18 Pa.C.S. Section 3922(a)(1)) conspired and agreed with Dr. Lee Otto Johnson that they or one or more of them would engage in conduct constituting such crime(s) or an attempt or solicitation to commit such crime(s), and in furtherance thereof did commit an overt act in violation of 18 Pa.C.S. Section 903(a)(1).

COUNT 9

Criminal Conspiracy, 18 Pa.C.S. Section 903(a)(1)

The actor, with the intent of promoting or facilitating the crime(s) of Theft by Deception (18 Pa.C.S. Section 3922(a)(1)) conspired and agreed with Sheryl Pinson-Smith that they or one or more of them would engage in conduct constituting such crime(s) or an attempt or solicitation to commit such crime(s), and in furtherance thereof did commit an overt act in violation of 18 Pa.C.S. Section 903(a)(1).

COUNT 10

Perjury, PA Election Code, 25 P.S. Section 3502, First Degree Misdemeanor

On or about the date set forth below the actor made a willfully false statement under oath or affirmation or in writing, stating that it is so made, although such oath or affirmation may not have actually been made, by any person regarding any material matter or thing relating to any subject being investigated, heard, determined or acted upon by any county board of elections, or member thereof, or by any court or judge thereof, judge of election, inspector of election, or overseer, in accordance with 25 P.S. 3246 and Section 3249 of the PA Election Code; that is to say that the Actor, a City of Pittsburgh Councilwoman and candidate in the 2003 General Election, on or about December 3, 2003, swore to a statement on an Allegheny County Elections Division form DSEB-503(12-99), a 30 day post-election Campaign Elections Statement, on which she, as candidate, attested under oath that her political committee, the Committee to Elect Twanda Carlisle, had not

violated any provisions of the Election Code, when in fact she knew that the provisions of 25 P.S. 3246 and Section 3249 of the PA Election Code had been violated; she, the Actor, signed under oath and filed the said Campaign Finance Statement that attesting to the fact that aggregate receipts, expenditures, or liabilities incurred by the Committee to Elect Twanda Carlisle did not exceed \$250.00 when, in fact, the Actor herself had made both deposits into that account during the pertinent period of time, and had made expenditures from that account, in excess of \$250.00 and all within the pertinent time period of the said report, as the same are reflected in the bank records of that said campaign finance account; this offense being Perjury, a misdemeanor of the first degree, and any person upon conviction thereof, shall be sentenced to pay a fine not exceeding ten thousand (\$10,000) dollars, or to undergo an imprisonment of not more than five (5) years, or both, in the discretion of the court; the applicable statute of limitations for this offense being extended pursuant to the exception set forth in the PA Judicial Code, 42 PA.C.S.A. 5552 (c)(1) and (2); the said offense being in violation of the act of June 3, 1937, P.L. 1333, Art. I, § 101, et seq. and art. XVIII, § 1802, as amended, 1998, Feb. 13, P.L. 72, No. 18, § 18.

COUNT 11

Perjury, PA Election Code, 25 P.S. Section 3502, First Degree Misdemeanor

On or about the date set forth below the actor made a willfully false statement under oath or affirmation or in writing, stating that it is so made, although such oath or affirmation may not have actually been made, by any person regarding any material matter or thing relating to any subject being investigated, heard, determined or acted upon by any county board of elections, or member thereof, or by any court or judge thereof, judge of election, inspector of election, or overseer, in accordance with 25 P.S. 3246 and Section 3249 of the PA Election Code; that is to say that the Actor, a City of Pittsburgh Councilwoman and candidate in the 2003 General Election, on or about February 2, 2004, swore to a statement on an Allegheny County Elections Division form DSEB-503(12-99), an Annual Report statement, on which she attested under oath, as candidate, that her political committee, the Committee to Elect Twanda Carlisle, had not violated any provisions of the Election Code, when in fact she knew that the provisions of 25 P.S. 3246 and Section 3249 of the PA Election Code had been violated; she, the Actor, signed under oath and filed the said Campaign Finance Statement that attesting to the fact that aggregate receipts, expenditures, or liabilities incurred by the Committee to Elect Twanda Carlisle did not exceed \$250.00 when, in fact, the Actor herself had made both deposits into that account during the pertinent period of time, and had made expenditures from that account, in excess of \$250.00 and all within the pertinent time period of the said report, as the same are reflected in the bank records of that said campaign finance account; this offense being Perjury, a misdemeanor of the first degree, and any person upon conviction thereof, shall be sentenced to pay a fine not exceeding ten thousand (\$10,000) dollars, or to undergo an imprisonment of not more than five (5) years, or both, in the discretion of the court; the applicable statute of limitations for this offense being extended pursuant to the exception set forth in the PA Judicial Code, 42 PA.C.S.A. 5552 (c) (1) and (2); the said offense being in violation of the act of June 3, 1937, P.L. 1333, Art. I, § 101, et seq. and art. XVIII, § 1802, as amended, 1998, Feb. 13, P.L. 72, No. 18, § 18.

COUNT 12

Perjury, PA Election Code, 25 P.S. Section 3502, First Degree Misdemeanor

On or about the date set forth below the actor made a willfully false statement under oath or affirmation or in writing, stating that it is so made, although such oath or affirmation may not have actually been made, by any person regarding any material matter or thing relating to any subject being investigated, heard, determined or acted upon by any county board of elections, or member thereof, or by any court or judge thereof, judge of election, inspector of election, or overseer, in accordance with 25 P.S. 3246 and Section 3249 of the PA Election Code; that is to say that the Actor, a City of Pittsburgh Councilwoman and candidate in the 2003 General Election, on or about February 2, 2004, and pursuant to the provisions of 25 P.S. 3246 and Section 3249 of the PA Election Code, swore to a statement on an Allegheny County Elections Division form DSEB-503(12-99), an Annual Report statement, on which she attested under oath, as candidate, that she had no aggregate receipts, expenditures, or liabilities in excess of \$250.00 when in fact she knew that she

had, and when, in fact the Actor herself had made both deposits into that account during the pertinent period of time, and had made expenditures from that account, in excess of \$250.00 and all within the pertinent time period of the said report, as the same are reflected in the bank records of that said campaign finance account; further, on that same form, the Actor swore that she had not violated any provisions of the Election Code, when in fact she knew that the provisions of 25 P.S. 3246 and Section 3249 of the PA Election Code had been violated since she herself made deposits and withdrawals from her campaign expense account; this offense being Perjury, a misdemeanor of the first degree, and any person upon conviction thereof, shall be sentenced to pay a fine not exceeding ten thousand (\$10,000) dollars, or to undergo an imprisonment of not more than five (5) years, or both, in the discretion of the court; the applicable statute of limitations for this offense being extended pursuant to the exception set forth in the PA Judicial Code, 42 PA.C.S.A. 5552 (c) (1) and (2); the said offense being in violation of the act of June 3, 1937, P.L. 1333, Art. I, § 101, et seq. and art. XVIII, § 1802, as amended, 1998, Feb. 13, P.L. 72, No. 18, § 18.

COUNT 13

Perjury, PA Election Code, 25 P.S. Section 3502, First Degree Misdemeanor

On or about the date set forth below the actor made a willfully false statement under oath or affirmation or in writing, stating that it is so made, although such oath or affirmation may not have actually been made, by any person regarding any material matter or thing relating to any subject being investigated, heard, determined or acted upon by any county board of elections, or member thereof, or by any court or judge thereof, judge of election, inspector of election, or overseer, in accordance with 25 P.S. 3246 and Section 3249 of the PA Election Code; that is to say that the Actor, a City of Pittsburgh Councilwoman and candidate in the 2003 General Election, on or about January 31, 2005, swore to a statement on an Allegheny County Elections Division form DSEB-503(12-99), a 30 day post-election Campaign Elections Statement, on which she, as candidate, attested under oath that her political committee, the Committee to Elect Twanda Carlisle, had not violated any provisions of the Election Code, when in fact she knew that the provisions of 25 P.S. 3246 and Section 3249 of the PA Election Code had been violated; she, the Actor, signed under oath and filed the said Campaign Finance Statement that attested to the fact that aggregate receipts, expenditures, or liabilities incurred by the Committee to Elect Twanda Carlisle were accurate as reported when such report failed to include in excess of two thousand dollars of deposits which she herself had made during the reporting period and failed to disclose certain expenditures that she had made from that campaign finance account as the same are reflected in the bank records of that said account; this offense being Perjury, a misdemeanor of the first degree, and any person upon conviction thereof, shall be sentenced to pay a fine not exceeding ten thousand (\$10,000) dollars, or to undergo an imprisonment of not more than five (5) years, or both, in the discretion of the court; the applicable statute of limitations for this offense being extended pursuant to the exception set forth in the PA Judicial Code, 42 PA.C.S.A. 5552 (c)(1) and (2); the said offense being in violation of the act of June 3, 1937, P.L. 1333, Art. I, § 101, et seq. and art. XVIII, § 1802, as amended, 1998, Feb. 13, P.L. 72, No. 18, § 18.

COUNT 14

Perjury, PA Election Code, 25 P.S. Section 3502, First Degree Misdemeanor

On or about the date set forth below the actor made a willfully false statement under oath or affirmation or in writing, stating that it is so made, although such oath or affirmation may not have actually been made, by any person regarding any material matter or thing relating to any subject being investigated, heard, determined or acted upon by any county board of elections, or member thereof, or by any court or judge thereof, judge of election, inspector of election, or overseer, in accordance with 25 P.S. 3246 and Section 3249 of the PA Election Code; that is to say that the Actor, a City of Pittsburgh Councilwoman and candidate in the 2003 General Election, on or about December 8, 2005, swore to a statement on an Allegheny County Elections Division form DSEB-503(12-99), a 30 day post-election Campaign Elections Statement, on which she, as candidate, attested under oath that her political committee, the Committee to Elect Twanda Carlisle, had not violated any provisions of the Election Code, when in fact she knew that the provisions of 25 P.S. 3246 and Section 3249 of the PA Election Code had been violated; she, the Actor, signed under oath

and filed the said Campaign Finance Statement that attested to the fact that aggregate receipts, expenditures, or liabilities incurred by the Committee to Elect Twanda Carlisle were accurate as reported when such report failed to include in excess of two thousand dollars of unreported deposits which she herself had made during the reporting period and failed to disclose certain expenditures she made from that account as the same are reflected in the bank records of that account; this offense being Perjury, a misdemeanor of the first degree, and any person upon conviction thereof, shall be sentenced to pay a fine not exceeding ten thousand (\$10,000) dollars, or to undergo an imprisonment of not more than five (5) years, or both, in the discretion of the court; the applicable statute of limitations for this offense being extended pursuant to the exception set forth in the PA Judicial Code, 42 Pa.C.S.A. 5552 (c)(1) and (2); the said offense being in violation of the act of June 3, 1937, P.L. 1333, Art. I, § 101, et seq. and art. XVIII, § 1802, as amended, 1998, Feb. 13, P.L. 72, No. 18, § 18.

✓ COUNT 15

Financial Interests Statement Violation, each a Statutory Misdemeanor
PA Public Official and Employees Ethics Act, 65 Pa.C.S. Section 1109(b)

On or about April 28, 2004, the Actor, a member of City Council of the City of Pittsburgh, violated the provisions of sections 1104 and 1105(b) of the PA Public Official and Employees Ethics Act, when she filed a Statement of Financial Interests for the year 2003 but upon it failed to disclose as required by law the name and source of any direct or indirect source of income totaling in the aggregate of over \$1300 or more, and any gift in excess of \$250 or more; that is to say the Actor failed to disclose required information concerning the sum of \$7,810.00 that was deposited into her personal bank account from on or about 9/12/03 through and including 12/16/03, the applicable statute of limitations for this offense being extended pursuant to the exceptions set forth in the PA Judicial Code, 42 Pa.C.S.A. 5552 (c)(1) and (2); the said offense being in violation of the act of October 15, 1998, P.L. 729, No. 93, section 1, as amended, [65 Pa.C.S.A. 1109 (b)].

✓ COUNT 16

Financial Interests Statement Violation, each a Statutory Misdemeanor
PA Public Official and Employees Ethics Act, 65 Pa.C.S. Section 1109(b)

On or about May 1, 2005, the Actor, a member of City Council of the City of Pittsburgh, violated the provisions of sections 1104 and 1105(b) of the PA Public Official and Employees Ethics Act, when she filed a Statement of Financial Interests for the year 2004 but upon it failed to disclose as required by law the name and source of any direct or indirect source of income totaling in the aggregate of over \$1300 or more, and any gift in excess of \$250 or more; that is to say the Actor failed to disclose required information concerning the sum of \$20,775.00 that was deposited into her personal bank account from on or about 1/22/04 through and including 11/17/04; the said offense being in violation of the act of October 15, 1998, P.L. 729, No. 93, section 1, as amended, [65 Pa.C.S.A. 1109 (b)].

✓ COUNT 17

Financial Interests Statement Violation, each a Statutory Misdemeanor
PA Public Official and Employees Ethics Act, 65 Pa.C.S. Section 1109(b)

On or about April 27, 2006, the Actor, a member of City Council of the City of Pittsburgh, violated the provisions of sections 1104 and 1105(b) of the PA Public Official and Employees Ethics Act, when she filed a Statement of Financial Interests for the year 2005 but upon it failed to disclose as required by law the name and source of any direct or indirect source of income totaling in the aggregate of over \$1300 or more, and any gift in excess of \$250 or more; that is to say the Actor failed to disclose required information concerning the sum of \$9,725.00 that was deposited into her personal bank account from on or about 1/18/05 through and including 10/3/05; the said offense being in violation of the act of October 15, 1998, P.L. 729, No. 93, section 1, as amended, [65 Pa.C.S.A. 1109 (b)].

all of which were against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly, or in violation of

- | | | | | | |
|----|--------------------------|-------------------------------|--------|-----------------------------------|----------------------|
| 1. | <u>3922</u>
(Section) | <u>(a)(1)</u>
(Subsection) | of the | <u>18 Pa.C.S.</u>
(PA Statute) | <u>3</u>
(counts) |
| 2. | <u>903</u>
(Section) | <u>(a)(1)</u>
(Subsection) | of the | <u>18 Pa.C.S.</u>
(PA Statute) | <u>3</u>
(counts) |
| 3. | <u>1109</u>
(Section) | <u>(a)</u>
(Subsection) | of the | <u>65 Pa.C.S.</u>
(PA Statute) | <u>3</u>
(counts) |
| 4. | <u>3502</u>
(Section) | | of the | <u>25 P.S.</u>
(PA Statute) | <u>5</u>
(counts) |
| 5. | <u>1109</u>
(Section) | <u>(b)</u>
(Subsection) | | <u>65 Pa.C.S.</u>
(PA Statute) | <u>3</u>
(counts) |

3. 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. **(In order for a warrant of arrest to issue, the attached affidavit of probable cause must be completed and sworn to before the issuing authority.)**
4. 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 P.A.C.S. §4904) relating to unsworn falsification to authorities.

4-10-09 (Date) [Signature] (Signature of Affiant)

AND NOW, on this date, 4-10-09 I certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed in order for a warrant to issue.

05-02-38
(Magisterial District)

[Signature]
(Signature)

SEAL

CHARLES A. McLAUGHLIN, DISTRICT JUSTICE
MAGISTERIAL DISTRICT 05-2-38
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2010

Editor's Note: The Pittsburgh Post-Gazette redacted Ms. Carlisle's driver's license number on page one of the police criminal complaint.

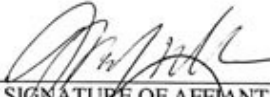
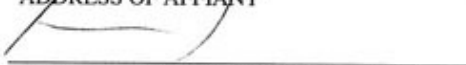
information to her handwritten on a yellow tablet. Carlisle stated that her City Council staff helped type the Johnson Health Study Report on the Pittsburgh City Council computers; she then put the report together. Carlisle stated that she assumed Dr. Johnson was a medical doctor because he had done the blood testing in a lab. (Johnson told your Affiant he is not a medical doctor.)

When Carlisle was asked about her publicly filed Campaign Finance Reports (CFR) she responded by saying ... I signed them, I prepared them, I am responsible for them. When asked about her failure to disclose on her CFRs cash withdrawals totaling approximately \$9,000.00 during the relevant time period she stated ... I forgot to list them. When shown that she recorded no campaign financial activity on the CFRs that she filed for November and December 2003 (her reelection period) she responded ... I thought I recorded all the checks. Carlisle admitted she maintained the Campaign Account check book and check register during the relevant time period.

Your Affiant reviewed the appendix sections of the Grand Jury Presentment which contains schedules of cash deposits by Twanda Carlisle into her bank accounts during the relevant time period and noted that during the relevant time period Carlisle made a total of 80 cash deposits into her personal bank account at Dollar Bank and into her Campaign Committee Account which was also held at Dollar Bank. Fifty (50) of the eighty (80) transactions by Carlisle involved cash deposits that were made within one day of the City check being converted to cash by the consultant; thirteen (13) of the remaining thirty (30) deposits were made within two (2) days of the City check being converted to cash by the consultant.

Your Affiant reviewed the Grand Jury Presentment and asserts that the Grand Jury's findings comport with the findings of your Affiant who conducted a criminal investigation into this matter. There exists a presumption of regularity which surrounds Grand Jury proceedings and as such your Affiant avers that this source of information, the Grand Jury Presentment, is presumed reliable. Your Affiant interviewed witnesses and reviewed financial documents mentioned in the Grand Jury Presentment. Your Affiant has attached a copy of said Presentment and offers the information contained therein as probable cause for the issuance of process, namely, a criminal complaint for the herein named actor.

SWORN TO and
SUBSCRIBED
Before me this 10 day
of July
2009


SIGNATURE OF AFFIANT
1444 Hillside Ave Pgh Pa
ADDRESS OF AFFIANT 15216

SIGNATURE OF ISSUING AUTHORITY

Seal of
Issuing Authority

00-0238
CHARLES A. McLAUGHLIN, DISTRICT JUSTICE
MAGISTERIAL DISTRICT NO. 05-2-38
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2010