

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CHESTER



**POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA**

VS.

Magisterial District Number: **15-4-03**

MDJ: Hon. **JOHN R. BAILEY**
748 SPRINGDALE DRIVE
SUITE 110
Address: **EXTON, PA 19341**
Telephone: **(610) 455-1150**

DEFENDANT:

(NAME and ADDRESS):

JOSEPH **VERNA** **JR**
First Name Middle Name Last Name Gen
17066 **ASHCOMB WAY**
ESTERO **FL** **33928**

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-47-23	Date Filed 2/13/24	OTN/LiveScan Number R 433 233-3	Complaint 5654	Incident Number 20-009952	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 2/19/1970	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
AKA	First Name	Middle Name	Last Name	Gen.

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic 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 checked="" type="checkbox"/> BLU (Blue)	<input 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 YES NO DNA Location WEIGHT (lbs.)

FBI Number MNU Number 180

Defendant Fingerprinted: YES NO Ft. HEIGHT In.

Fingerprint Classification: 6 0

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <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).

(Name of the attorney for the Commonwealth) _____ (Signature of the attorney for the Commonwealth) _____ (Date) _____

I, **SCOTT E PEZICK**

(Name of the Affiant)

of **West Whiteland Twp Police Dept**

(Identify Department or Agency Represented and Political Subdivision)

17424

WW27

PSP/MPOETC - Assigned Affiant ID Number and Badge # **COURT**

PA0154000

(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 _____

FEB 13 2023

15 4 03

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 **[254] West Whiteland Township**

(Subdivision Code) (Place-Political Subdivision)

760 LINCOLN HWY WEST EXTON, PA 19341

in **CHESTER** County **[15]** on or about **Between 01/01/2009 and 12/31/2019**

(County Code)

(Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR-47-23	Date Filed: 2/13/23	OTM LiveScan Number R433233-3	Complaint 5654	Incident Number 20-009952
Defendant Name	First: JOSEPH	Middle:	Last: VERNA	JR

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 14.
- 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.)

SCOTT E PEZICK

2/13/23
(Date)

Det. Scott Pezick
(Signature of Affiant)

AND NOW, on this date 13 Feb 2023 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.

15-4-03

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CK-47-23	Date Filed: 2/13/23	OTN/Dive/Scan Number R 433	Complaint 5654	Incident Number 20-009952
Defendant Name	First: JOSEPH	Middle:	Last: VERNA	JR

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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	1	3921	A	of the	18	5	F3	2399	
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Unlaw Taking-Movable Prop

Acts of the accused associated with this Offense:

The actor unlawfully took, or exercised unlawful control over movable property, with a total value greater than \$2,000 from another with the intent to deprive the owner thereof, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -3921(a), as amended.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	2	3922	A2	of the	18	5	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Decept-Prevent Acqu Of Info

Acts of the accused associated with this Offense:

The actor intentionally obtained or withheld property belonging to another person by preventing said other person from acquiring information which would affect said other person's judgment of a transaction, in violation of Section 3922(a)(2) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. 3922(a)(2).



POLICE CRIMINAL COMPLAINT

Docket Number: CR-47-23	Date Filed: 2/13/23	OTM/LiveScan Number R 433233-3	Complaint 5654	Incident Number 20-009952
Defendant Name	First: JOSEPH	Middle:	Last: VERNA	JR

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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	3	3924		of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft Property Lost Etc By Mistake

Acts of the accused associated with this Offense:

A person who comes into control of property of another that he knows to have been lost, mislaid, or delivered under a mistake as to the nature or amount of the property or the identity of the recipient is guilty of theft if, with intent to deprive the owner thereof, he fails to take reasonable measures to restore the property to a person entitled to have it.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	3925	A	of the	18	5	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the 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, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input checked="" type="checkbox"/>	4	3921	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Unlaw Taking-Movable Prop

Acts of the accused associated with this Offense:

Conspiracy to cc3921.



POLICE CRIMINAL COMPLAINT

Docket Number: CR - 47-23	Date Filed: 2/13/23	OTN/LiveScan Number R 433 233-3	Complaint 5654	Incident Number 20-009952
Defendant Name	First: JOSEPH	Middle:	Last: VERNA	JR

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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	5	3921	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Unlaw Taking-Movable Prop

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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	5	3922	A2	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Decept-Prevent Acqu Of Info

Acts of the accused associated with this Offense:

The actor intentionally obtained or withheld property, belonging to another person by preventing said other person from acquiring information which would affect said other person's judgment of a transaction, in violation of Section 3922(a)(2) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. 3922(a)(2).



POLICE CRIMINAL COMPLAINT

Docket Number: CR-47-23	Date Filed: 2/13/23	OTN/LiveScan Number: R 433233-3	Complaint 5654	Incident Number 20-009952
Defendant Name	First: JOSEPH	Middle:	Last: VERNA	JR

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.

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	4106	A1	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Access Device Used To Obt Or Att Obt Prop/Service

Acts of the accused associated with this Offense:

A person commits an offense if he:

(iv) for any other reason his use of the access device is unauthorized by the issuer or the device holder

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	3927	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Fail To Make Req Disp Funds

Acts of the accused associated with this Offense:

To withhold property of another permanently or for so extended a period as to appropriate a major portion of its economic value, or with intent to restore only upon payment of reward or other compensation.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	7	3921	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Unlaw Taking-Movable Prop

Acts of the accused associated with this Offense:

Conspiracy to 3921



POLICE CRIMINAL COMPLAINT

Docket Number: CA-47-23	Date Filed: 2/13/23	OTN/LiveScan Number: R 433233-3	Complaint: 5654	Incident Number: 20-009952
Defendant Name:	First: JOSEPH	Middle:	Last: VERNA	JR

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.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	8	3922	A2	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of the statute or ordinance):

Theft By Decept-Prevent Acqu Of Info

Acts of the accused associated with this Offense:

Conspiracy to 3922

Please provide the following information for each co-defendant



Co-Defendant Data Sheet

Docket Number: CA-47-23	Date Filed: 2/13/23	OTN/LiveScan Number R 433233-3	Complaint 5654	Incident Number 20-009952
Defendant Name	First: JOSEPH	Middle:	Last: VERNA	JR

Complaint/Incident Number 5654	Co-Defendant # <u>1</u>
KAREN VERNA (Name)	
17066 ASHCOMB WAY (Home Street Address)	
ESTERO, FL 33928 (City, State & ZIP Code)	610-942-0199 (Telephone #)