

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF CHESTER

Magisterial District Number: 15-4-03

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



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS):

KAREN

VERNA

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-46-23 | Date Filed: 2/13/23 | OTN/LiveScan Number: 1R 433218-2 | Complaint: 5712 | Incident Number: 20-009952 | Request Lab Services? YES NO

GENDER: Male Female
 DOB: 10/26/1970 | POB: | Add'l DOB: | Co-Defendant(s):
 AKA: First Name: | Middle Name: | Last Name: | Gen:

RACE: White Asian Black Native American Unknown
 ETHNICITY: Hispanic Non-Hispanic Unknown

HAIR COLOR: GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown)
 BLK (Black) ONG (Orange) WHI (White) XXX (Unk/Bald) GRN (Green) PNK (Pink)
 BLN (Blonde / Strawberry)

EYE COLOR: BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray)
 HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown)

DNA: YES NO | DNA Location: | WEIGHT (lbs.): 130
 FBI Number: | MNU Number: | Ft. HEIGHT In.: 5 4
 Defendant Fingerprinted: YES NO
 Fingerprint Classification:

DEFENDANT VEHICLE INFORMATION

Plate #: | State: | Hazmat: | Registration Sticker (MM/YY): | Comm'l Veh. Ind.: | School Veh.: | Oth. NCIC Veh. Code: | Reg. same as Def.:
 VIN: | Year: | Make: | Model: | Style: | Color: DISTRICT COURT

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). FEB 13 2023

(Name of the attorney for the Commonwealth) _____ (Signature of the attorney for the Commonwealth) _____ (Date) 15-4-03

I, **SCOTT E PEZICK** (Name of the Affiant) **17424 WW27** PSP/MPOETC -Assigned Affiant ID Number and Badge #
 of **West Whiteland Twp Police Dept** (Identify Department or Agency Represented and Political Subdivision) **PA0154000** (Police Agency ORI Number)
 do hereby state: (check appropriate box)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____
 I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe
 with violating the penal laws of the Commonwealth of Pennsylvania at **[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: <i>CR-46-23</i> | Date Filed: <i>2/13/23</i> | OTN/LiveScan Number <i>R 433218-2</i> | Complaint 5712 | Incident Number 20-009952 |
| Defendant Name | First: KAREN | Middle: | Last: VERNA | |

- 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 11.
- 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

PEZICK

(Date)

(Signature of Affiant)

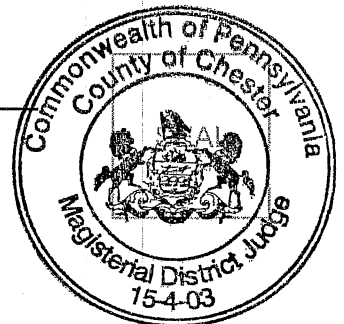
AND NOW, on this date *13 FEB 2023* I certify that the complaint has been properly completed and verified.

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: CP-46-23 | Date Filed: 2/13/23 | OTN/LiveScan Number R 433218-2 | Complaint 5712 | Incident Number 20-009952 |
| Defendant Name | First: KAREN | Middle: | Last: VERNA | |

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 checked="" type="checkbox"/> | 1 | 3921 | A | of the | 18 | 1 | 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 |
|------------------------------|-----------------|-------------------------------------|--------------------------------------|------------------------------------|

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 type="checkbox"/> Conspiracy 18 903 | Number of Victims Age 60 or Older _____ |
|------------------|--|---|---|---|

| | | | | | | | | | |
|--------------------------|-----------|-------------|------------|--------|--------------------|----------|-----------|-----------|----------------|
| <input type="checkbox"/> | 2 | 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 |
|------------------------------|-----------------|-------------------------------------|--------------------------------------|------------------------------------|

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:

A person is guilty of theft if he intentionally obtains or withholds property of another by deception. A person deceives if he intentionally: prevents another from acquiring information which would affect his judgment of a transaction; or (3) fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship.

| | | | | |
|------------------|--|---|--|---|
| 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 checked="" type="checkbox"/> | 3 | 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 |
|------------------------------|-----------------|-------------------------------------|--------------------------------------|------------------------------------|

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: CR-46-23 | Date Filed: 2/13/23 | OTM/LiveScan Number R433 218-2 | Complaint 5712 | Incident Number 20-009952 |
| Defendant Name | First: KAREN | Middle: | Last: VERNA | |

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.

| | | | | |
|---|--|---|--|---|
| <input type="checkbox"/> 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"/> Lead? | 4 | 3922 | A2 | of the | 18 | 1 | F3 | | |
| | 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 |
|------------------------------|-----------------|--|-------------------------------------|--------------------------------------|------------------------------------|

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: CR-46-23 | Date Filed: 2/13/23 | OTN/LiveScan Number R433218-2 | Complaint 5712 | Incident Number 20-009952 |
| Defendant Name | First: KAREN | Middle: | Last: VERNA | |

| | |
|---|--------------------------------------|
| Complaint/Incident Number 5712 | Co-Defendant # <u>1</u> |
| JOSEPH VERNA JR (Name) | |
| 17066 ASHCOMB WAY (Home Street Address) | |
| ESTERO, FL 33928 (City, State & ZIP Code) | 484-459-0780 (Telephone #) |