

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF BUCKS
 Magisterial District Number: **07-2-07**
 MDJ: Hon. **MICHAEL W. PETRUCCI**
28 NORTH STATE STREET
NEWTOWN, PA 18940
 Address:
 Telephone: **215-968-1657**



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
RYAN JEFFREY POTTS
 First Name Middle Name Last Name Gen
520 AMHURST
BENSALEM PA

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: **CR-158-23** Date Filed: **10/18/23** OTN/LiveScan Number: **1 B1000608-0** Complaint: **235** Incident Number: **99-23-0583** Request Lab Services: YES NO

GENDER Male Female
 DOB: **08/20/1990** POB: **AKA** Add'l DOB: **First Name Middle Name Last Name Gen.**
 Co-Defendant(s)

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.)**
FBI Number **MNU Number** **130**

Defendant Fingerprinted: YES NO **FL HEIGHT In.**

Fingerprint Classification: **5 8**

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

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).

CHRISTOPHER REES **10/12/2023**
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, **JARROD EISENHAUER** / **EDMOND O'BRIEN / MICHAEL GACRUSKI** **35170** **9931**
 (Name of the Affiant) PSP/MPOETC - Assigned Affiant ID Number and Page #
 of **Bucks County Detectives / BRISTOL TWP** **PA0094800**
 (Identify Department or Agency Represented and Political Subdivision) (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 **[224] Upper Makefield Township**
 (Subdivision Code) (Place-Political Subdivision)
BUCKS COUNTY, PENNSYLVANIA
 in **BUCKS** County [**09**] on or about **Between 05/01/2023 and 10/16/2023**
 (County Code) (Offense Date)

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POLICE CRIMINAL COMPLAINT

Docket Number: CR-158-23	Date Filed: 10/18/2023	OTN/LiveScan Number B1000408-0	Complaint 235	Incident Number 99-23-0583
Defendant Name	First: RYAN	Middle: JEFFREY	Last: POTTS	

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	911	B2	of the	18	1	F1		
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):

Corrupt Org-Int/Control In Enterp

Acts of the accused associated with this Offense:

Corrupt Organizations

(a) Findings of fact.--The General Assembly finds that:

- (1) organized crime is a highly sophisticated, diversified, and widespread phenomenon which annually drains billions of dollars from the national economy by various patterns of unlawful conduct including the illegal use of force, fraud, and corruption;
- (2) organized crime exists on a large scale within the Commonwealth of Pennsylvania, engaging in the same patterns of unlawful conduct which characterize its activities nationally;
- (3) the vast amounts of money and power accumulated by organized crime are increasingly used to infiltrate and corrupt legitimate businesses operating within the Commonwealth, together with all of the techniques of violence, intimidation, and other forms of unlawful conduct through which such money and power are derived;
- (4) in furtherance of such infiltration and corruption, organized crime utilizes and applies to its unlawful purposes laws of the Commonwealth of Pennsylvania conferring and relating to the privilege of engaging in various types of business and designed to insure that such businesses are conducted in furtherance of the public interest and the general economic welfare of the Commonwealth;
- (5) such infiltration and corruption provide an outlet for illegally obtained capital, harm innocent investors, entrepreneurs, merchants and consumers, interfere with free competition, and thereby constitute a substantial danger to the economic and general welfare of the Commonwealth of Pennsylvania; and
- (6) in order to successfully resist and eliminate this situation, it is necessary to provide new remedies and procedures.

(b) Prohibited activities.--

- (2) It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise.

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POLICE CRIMINAL COMPLAINT

Docket Number: CR-158-23	Date Filed: 10/18/2023	OTN/LiveScan Number B1000608-0	Complaint 235	Incident Number 99-23-0583
Defendant Name	First: RYAN	Middle: JEFFREY	Last: POTTS	

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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	3921	A	of the	18	1	F1		
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, namely Utility wires from Verizon Business with the intent to deprive the owner thereof and the offense was committed during a manmade disaster, a natural disaster or a war-caused disaster, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -3921(a), as amended.

The actor unlawfully took, or exercised unlawful control over movable property, namely Utility wires, with a total value greater than \$2,000 from Verizon Business 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.

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POLICE CRIMINAL COMPLAINT

Docket Number: CR-158-23	Date Filed: 10/18/2023	OTN/LiveScan Number B1000608-0	Complaint 235	Incident Number 99-23-0583
Defendant Name	First: RYAN	Middle: JEFFREY	Last: POTTS	

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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"/>	3	3921	A	of the	18	1	F1		
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:

903. Criminal conspiracy.

(a) Definition of conspiracy.--A person is guilty of conspiracy with another person or persons to commit a crime if with the intent of promoting or facilitating its commission he:

- (1) agrees with such other person or persons that they or one or more of them will engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; or
- (2) agrees to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime.

The actor unlawfully took, or exercised unlawful control over movable property, namely Utility wires from Verizon Business with the intent to deprive the owner thereof and the offense was committed during a manmade disaster, a natural disaster or a war-caused disaster, in violation of Section 3921(a) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -3921(a), as amended.

The actor unlawfully took, or exercised unlawful control over movable property, namely Utility wires, with a total value greater than \$2,000 from Verizon Business 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.

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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	1	F1		
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:

The actor intentionally received, retained or disposed of movable property, namely, Utility wires belonging to Verizon Business with no intent to restore it to the owner, knowing that such property was stolen or believing that it had probably been stolen, in violation of Section 3925 of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -3925, as amended.



POLICE CRIMINAL COMPLAINT

Docket Number: CR-158-23	Date Filed: 10/18/2023	OTN/LiveScan Number B1000608-0	Complaint 235	Incident Number 99-23-0583
Defendant Name	First: RYAN	Middle: JEFFREY	Last: POTTS	

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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"/>	5	3925	A	of the	18	1	F1		
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:

903. Criminal conspiracy.

(a) Definition of conspiracy.--A person is guilty of conspiracy with another person or persons to commit a crime if with the intent of promoting or facilitating its commission he:

- (1) agrees with such other person or persons that they or one or more of them will engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; or
- (2) agrees to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime.

The actor intentionally received, retained or disposed of movable property, namely, Utility wires belonging to Verizon Business with no intent to restore it to the owner, knowing that such property was stolen or believing that it had probably been stolen, in violation of Section 3925 of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -3925, as amended.

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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"/>	6	5111	A1	of the	18	1	F1		
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):

Deal In Proc Unl Act/Intent To Promote

Acts of the accused associated with this Offense:

The actor, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, namely deprive the Verizon Business of wire and sell to a scrap yard for a profit conducting a financial transaction which involved the proceeds of unlawful activity with intent to promote the carrying on of the unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise nature, location, source, ownership or control of the proceeds of unlawful activity and/or to avoid a transaction reporting requirement under State or Federal law, in violation of Section 5111 of the Pennsylvania Crimes Code, Act 108(1) of 1989, 18 Pa. C.S. 5111.



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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	6111	C	of the	18	1	F2		
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):

Firearm Ownership - Duty Of Other Persons

Acts of the accused associated with this Offense:

The actor, not a licensed importer, manufacturer or dealer, sold or transferred a firearm to another unlicensed person and failed to make such transfer at the place of business of a licensed importer, manufacturer, dealer or county sheriff's office, in violation of Section 6111(c) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -6111(c), 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 _____					
<input type="checkbox"/>	8	3935.1	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 of Secondary Metal

Acts of the accused associated with this Offense:

A person commits the offense of theft of secondary metal if the person unlawfully takes or attempts to take possession of, carries away or exercises unlawful control over any secondary metal with intent to deprive the rightful owner thereof.

(4) When the value of the secondary metal unlawfully obtained is \$1,000 or more, the offense constitutes a felony of the third degree.

(d) Definition.--As used in this section, the term "secondary metal" means wire, pipe or cable commonly used by communications, gas, water, wastewater and electrical utilities and railroads and mass transit or commuter rail agencies, copper, aluminum or other metal, or a combination of metals, that is valuable for recycling or reuse as raw material.

(June 22, 2017, P.L.213, No.8, eff. 60 days)

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POLICE CRIMINAL COMPLAINT

Docket Number: CR-158-23	Date Filed: 10/18/2023	OTN/LiveScan Number B1000608-0	Complaint 235	Incident Number 99-23-0583
Defendant Name	First: RYAN	Middle: JEFFREY	Last: POTTS	

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<input type="checkbox"/>	9	3935.1	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 of Secondary Metal

Acts of the accused associated with this Offense:

903. Criminal conspiracy.

(a) Definition of conspiracy.--A person is guilty of conspiracy with another person or persons to commit a crime if with the intent of promoting or facilitating its commission he:

- (1) agrees with such other person or persons that they or one or more of them will engage in conduct which constitutes such crime or an attempt or solicitation to commit such crime; or
- (2) agrees to aid such other person or persons in the planning or commission of such crime or of an attempt or solicitation to commit such crime.

A person commits the offense of theft of secondary metal if the person unlawfully takes or attempts to take possession of, carries away or exercises unlawful control over any secondary metal with intent to deprive the rightful owner thereof.

(4) When the value of the secondary metal unlawfully obtained is \$1,000 or more, the offense constitutes a felony of the third degree.

(d) Definition.--As used in this section, the term "secondary metal" means wire, pipe or cable commonly used by communications, gas, water, wastewater and electrical utilities and railroads and mass transit or commuter rail agencies, copper, aluminum or other metal, or a combination of metals, that is valuable for recycling or reuse as raw material.

(June 22, 2017, P.L.213, No.8, eff. 60 days)

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POLICE CRIMINAL COMPLAINT

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<input type="checkbox"/> 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	3304	A1	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
<input type="checkbox"/> 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):

Crim Misch/Dmg Prop Intent, Reckless, Or Neglig

Acts of the accused associated with this Offense:

The actor intentionally damaged tangible property of another, namely Verizon Company in the employment of fire, explosives, or other dangerous means listed in Section 3302(a)(relating to causing or risking catastrophe) causing a pecuniary loss in excess of \$5,000.00 or causing a substantial interruption or impairment of public communications, transportation, supply of water, gas or power, or other public service, in violation of Section 3304 (a)(1) and (b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -3304(a)(1) and (b), as amended.

<input type="checkbox"/> 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	7612	A	of the	18	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
<input type="checkbox"/> 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):

Disruption of Service

Acts of the accused associated with this Offense:

A person commits an offense if he intentionally or knowingly engages in a scheme or artifice, including, but not limited to, a denial of service attack upon any computer, computer system, computer network, computer software, computer program, computer server, computer database, World Wide Web site or telecommunication device or any part thereof that is designed to block, impede or deny the access of information or initiation or completion of any sale or transaction by users of that computer, computer system, computer network, computer software, computer program, computer server or database or any part thereof.

(b) Grading.--An offense under this section shall constitute a felony of the third degree.

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POLICE CRIMINAL COMPLAINT

Docket Number: CR-158-23	Date Filed: 10/18/2023	OTN/LiveScan Number B1000608-0	Complaint 235	Incident Number 99-23-0583
Defendant Name	First: RYAN	Middle: JEFFREY	Last: POTTS	

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<input type="checkbox"/> 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"/>	12	7512	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):

Criminal Use Of Communication Facility

Acts of the accused associated with this Offense:

The actor used a communication facility to commit, cause, or facilitate the commission or the attempted commission of a crime constituting a felony under Title 18 of the Pennsylvania Crimes Code, or a felony under the Controlled Substance Drug Device and Cosmetic Act namely, to solicit the straw purchase of a gun and to arrange the theft, transport, and sale of Verizon Utility wires, in violation of Section 7512 of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C. S.- 7512, as amended.

<input type="checkbox"/> 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"/>	13	6105	A1	of the	18	1	M1		
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):

Possession Of Firearm Prohibited

Acts of the accused associated with this Offense:

The actor possessed, used, controlled, sold, transferred, manufactured or obtained a license to possess, use, control, sell, transfer or manufacture a firearm, said actor having been previously convicted of prohibited offensive weapons within or without this Commonwealth, in violation of Section 6105 (a) (1) and (b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -6105 (a) (1) and (b), as amended. The actor possessed, used, controlled, sold, transferred, manufactured or obtained a license to possess, use, control, sell, transfer or manufacture a firearm, said actor having an active warrant issued in his name within or without this Commonwealth, in violation of Section 6105 (a) (1) and (b) of the Pennsylvania Crimes Code, Act of December 6, 1972, 18 Pa. C.S. -6105 (a) (1) and (b), as amended.

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POLICE CRIMINAL COMPLAINT

Docket Number: <i>CR-158-23</i>	Date Filed: <i>10/18/2023</i>	OTN/LiveScan Number <i>B1000608-0</i>	Complaint <i>235</i>	Incident Number <i>99-23-0583</i>
Defendant Name	First: <i>RYAN</i>	Middle: <i>JEFFREY</i>	Last: <i>POTTS</i>	

AFFIDAVIT OF PROBABLE CAUSE

Please see attachment A

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MICHAEL GREGORSKI
EDMOND O'BRIEN

I, **JARROD EISENHAUER**, 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.

MAL 29931 _____ *10/18/23*
 (Signature of Affiant)

Sworn to me and subscribed before me this *18* day of *October* *2023*

10/18/23 Date _____

My commission expires first Monday of January, *2028*



Bucks County Detectives / Bristol Township Police Department



Office of the Bucks County District Attorney

99-22-0583

Affidavit of Probable Cause

Attachment A

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Probable Cause belief is based upon the following facts and circumstances:

Your Honor, your Affiants are Bucks County Drug Strike Force Detective Jarrod Eisenhauer, badge 9931, Bristol Township Police Officer Edmond O'Brien badge 25118, and Bristol Township Police Officer Michael Grebloski badge 25172.

Whereas, this affidavit provides the probable cause for the defendants involved in the destruction, theft, trespassing, and profit gain of stolen Verizon utility wires in Bucks County, Pennsylvania, to include in the Bristol Borough, Bristol, Bensalem, Upper Makefield, Lower Makefield Townships of Bucks County, Pennsylvania. The defendants who are named throughout this affidavit of probable cause are identified as operators and/or employees of the POTTS and HARKINS Theft Organization.

INTRODUCTION

This affidavit of probable cause does not identify the names of confidential sources. These persons will be identified as CS and have an assigned number (Example CS-00). This is done for their safety, as members of the POTTS and HARKINS Theft Organization have been identified as violent and have direct access to firearms. This organization also has named and unnamed members who have conducted straw purchases of firearms for the members of the POTTS and HARKINS Theft Organization.

A person identified as CS-01 throughout this affidavit of probable cause does not have a criminal history where he / she has been charged with a crimen falsi crime. Additionally, CS-01 has cooperated with other investigations where he / she has been found to be truthful and reliable. CS-01 has never given law enforcement any reason to not believe the information being provided by them.

A person identified as CS-02 throughout this affidavit of probable cause does have a criminal history where he / she has been charged with a crimen falsi act. Although CS-02 has been charged with a crimen falsi charge he / she has been found to be truthful and reliable when providing information and details during this investigation. When being provided information by CS-02 his / her information has been corroborated.

DEFENDANT

Based upon the details provided by the underwritten facts of this probable cause affidavit the defendant, Ryan POTTS a member and leader of the POTTS and HARKINS Theft Organization did participate in facilitating the destruction, theft, trespassing, and profit gain of stolen Verizon utility wires along with additional members of the organization who themselves played a role in the destruction, theft, trespassing, and profit gain of stolen Verizon utility wires.

Ryan POTTS is a person not to possess a firearm. Ryan POTTS is not an employee or contractor of Verizon with permission to destroy, remove, take or sell Verizon utility wires.

The co-defendants along with Ryan POTTS in the POTTS and HARKINS Theft Organization are listed as follows:

- Marianna HARKINS
- Nicholas PALMER
- Paige EISEMAN
- Frederick LEE
- Richard MACHEN
- Michael CRONON
- Kimberly MAYGER
- Raymond PAUL

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During this investigation your affiants utilized recording devices for some of the meetings with the defendants named within this affidavit of probable cause. The cooperating individuals prior to the recordings agreed to a one-party consent.

BACKGROUND

During the month of July 2023, your affiants were provided details and information from CS-01 and CS-02 that Ryan POTTS asked CS-02 to conduct a straw purchase of a firearm namely a "GLOCK". Ryan POTTS was requesting CS-02 to purchase a firearm for him at a local gun shop, and after making the purchase, Ryan POTTS wanted to take possession of the firearm, stage a theft of the firearm in Middletown Township, Bucks County and obliterate the serial number on the firearm.

CS-01 and CS-02 also explained that Ryan POTTS and Marianna HARKINS were leading an organization of people in the theft and sales of Verizon utility wires. This organization, although said to have been led by Ryan POTTS and Marianna HARKINS, also included, Nicholas PALMER, Paige EISEMAN, Frederick LEE, Haley JAZLOVIETCKI, Kimberly MAYGER, Raymond PAUL, and Michael CRONON.

CS-01 and CS-02 identified two vehicles that were used by the organization described as a white panel van driven by Frederick LEE and a U-Haul van that was being driven by either Nicholas PALMER or Paige EISEMAN. Organization members used these vehicles to drive to locations

in and around Bucks County, Pennsylvania to find new “cutting “locations, to pick up, transport, burn, and scrap the stolen Verizon utility wires.

CS-01 and CS-02 showed law enforcement an area they knew was a common location for the organization to go to and cut the Verizon utility wire. This area was located within the Upper Makefield and Lower Makefield Townships of Bucks County, Pennsylvania. CS-01 explained that the organization went to this area to take the wire because of the size (thickness) of the wire and that the roadway was closed.

CS-01 stated that members of the organization were profiting from this area after tragedy struck, and lives were lost. CS-01 and CS-02 stated that the members of the organization knew that this location was a safe area because they knew members of law enforcement were overwhelmed in dealing with a multi person fatal flash flooding causing the death of adults and children. CS-01 and CS-02 described that during a previous Verizon utility wire cutting the members of the organization cutting the wires disguised themselves as search party members looking for children who were still missing from the flash flood. These persons did not assist in looking for the missing children, but they continued to cut and steal the Verizon utility wires.

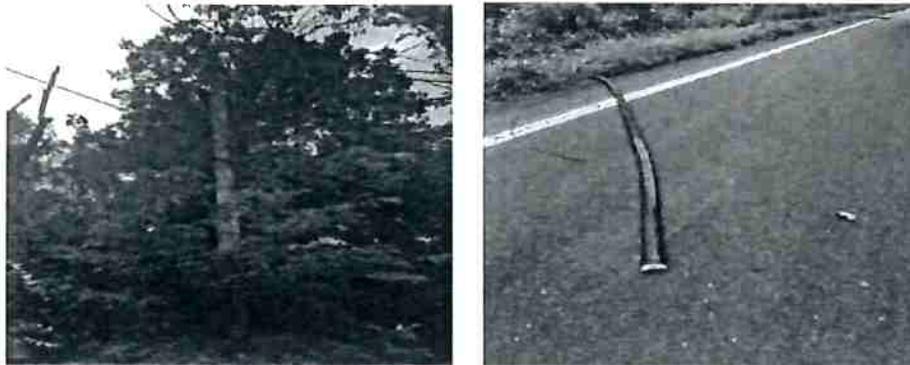
It was found that once the wires are cut down from the poles and cut into smaller sizes the members of the organization cut the outer carrier and dispose of it. The individual bundle of wires is then burned in order to remove the plastic coating leaving just the strands of copper wire. The copper wire is then transported to the EMR (European Metal Recycling) to be scrapped for a profit. CS-01 and CS-02 stated that members of the organization know a worker at EMR who helps the organization with scrapping the wires.

CUTTING / THEFT LOCATIONS

Your affiant found that the POTTS and HARKINS Theft Organization committed wire theft and property damage to Verizon company in Bucks County, Pennsylvania. The locations described as being utilized as a cutting / theft location by the organization to cut and remove Verizon utility wires are listed as follows.

- Taylorsville Road, Lower Makefield, Bucks County, Pennsylvania. Your affiants observed a large, multi-pair Verizon utility wire cut and lying in the closed roadway and a length of cut Verizon utility wire off the road in the weeds. Crimes associated with this location took place shortly after a flash flood in the area claimed several lives, including the lives of children, and the location was deemed Natural Disaster (State of Emergency) area (Pictured in Photo Group 1).

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(Photo Group 1)

- Mearns Road, Warminster, Bucks County, Pennsylvania, where a large cut overhead cable was observed hanging from a utility pole. (This location was described as the thickest wire Marianna HARKINS ever saw)
- Taylorsville Road in the area of Crossing Farm Lane Upper Makefield Township, Bucks County, Pennsylvania.
- State Road and American Drive, Bensalem, Bucks County, Pennsylvania.
- Wilson Avenue, Bristol, Bucks County, Pennsylvania.

The corroborating details and facts showing that this organization utilized these areas to deprive others of communications by climbing utility poles to cut and take the Verizon utility wires will be further explained throughout this affidavit of probable cause. The Verizon company confirmed that the utility wires in these areas are active lines that are either in service or are available to provide service to Verizon customers. These utility wires and supporting cables were cut by a tool or tools and were not cut as a result of an accident.

BURN / WIRE REMOVAL LOCATIONS:

The locations described as being utilized as a burn / wire removal location by the organization to remove the protecting coating, remove the copper plastic coated wire, and to burn the plastic from the copper utility wires are listed as follows. Your affiants learned the EMR metal recycling business would not take the copper utility wires with the thick protecting coating surrounding the wires or if the individual wires still had the plastic coating surrounding the copper. Because of this the members of the organization used burn / wire removal areas to strip the outer protecting coating, light fires, and burn the wire coating in order to take the wire to EMR to gain a profit.

- The rear of a residence at 9244 Old Tyburn Road, Morrisville, Bucks County, Pennsylvania.
- The area of 5900 Bristol Pike Bristol, Bucks County, Pennsylvania.

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- The area of the Set Rite business at 5790 Bristol Pike Bristol, Bucks County, Pennsylvania.
- The area of the Valero business at 905 Bristol Pike Bristol, Bucks County, Pennsylvania.
- The area of the Bristol Public Works building at 92 Maple Beach Road Bristol, Bucks County, Pennsylvania.
- The rear of a residence at 4701 Newportville Road, Levittown, Bucks County, Pennsylvania.
- The property of 13 Lynbrook Drive Hopewell Township, New Jersey.
- The area of Mile Street and Broadway Avenue Bristol, Bucks County, Pennsylvania.
- The area of 5725 Beaver Dam Road Bristol, Bucks County, Pennsylvania.
- The area of Cabot Boulevard and Old Oxford Valley Road, Langhorne, Bucks County, Pennsylvania.
- The basement of the residence is located at 430 Washington Avenue, Bristol, Bucks County, Pennsylvania.

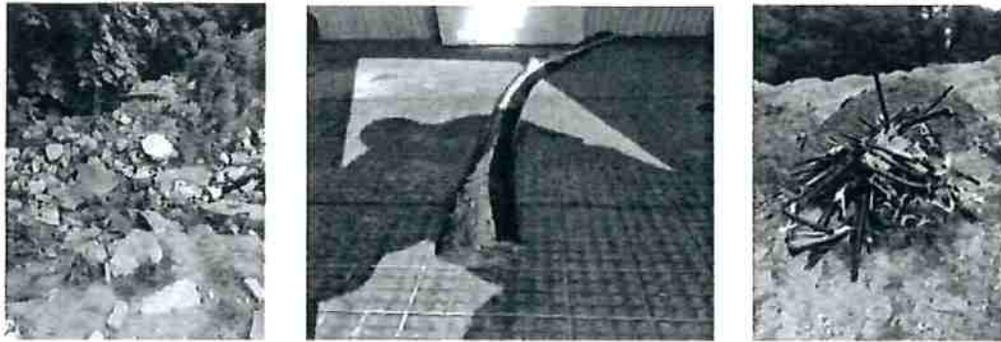
Your affiants during surveillance either watched members of the organization ignite a large uncontrolled burn or found evidence of a large uncontrolled burn area within each of these locations.

PROBABLE CAUSE:

RECOVERED WIRE (Lee / Potts)

On July 1, 2023, Bristol Township Police Officer Joshua Bausch #25165 responded to the 5000 block of Bristol Pike, Bristol, Pennsylvania 19007 for a report of a brush fire. When arriving he found a large amount of cut Verizon utility wire, a burn location, and a large pile of Verizon utility wire outer casing (Pictured in Photo Group 2). Officer Bausch observed three male subjects in the area of the burning Verizon utility wire. Two of the males fled the location while a third male identified as Frederick LEE remained at the scene.

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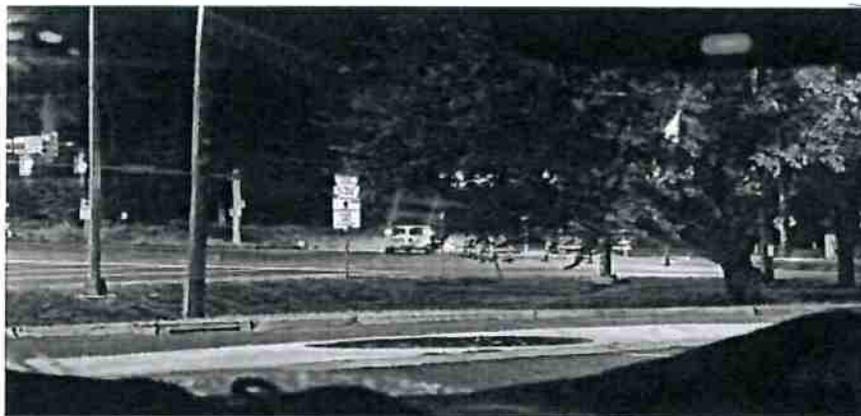
(Photo Group 2)

When checking the scene of the burning utility wire, law enforcement located an abandoned or lost iPhone that was charged and active on the ground. The iPhone cellular telephone was secured and entered into evidence. A search warrant was later executed on the device to search the contents. The conclusion of the search warrant showed that the cellular telephone belonged to Ryan POTTS.

WIRE CUTTING AND REMOVAL (Palmer / Eiseman)

During the month of July 2023, CS-02 contacted your affiant (Eisenhauer) and advised that Nicholas PALMER called him/ her from telephone number (267)245-5026 and asked for CS-02's help with taking a portion of Verizon utility wires from the area of Taylorsville Road, Lower Makefield, Bucks County, Pennsylvania.

Under the instruction of law enforcement CS-02 went to Nicholas PALMER's residence at 59 Tapered Oak Lane Levittown, Pennsylvania and was greeted by Nicholas PALMER and Paige EISEMAN. After talking, Nicholas PALMER, Paige EISEMAN, and CS-02 entered a white U-Haul van with Arizona registration AL72128 and drove away with Nicholas PALMER driving. The vehicle was followed by surveillance to the closed portion of Taylorsville Road. The occupied U-Haul van drove around the barriers to the location of the cut wires (Pictured in Photo Group 3).



(Photo Group 3)

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When arriving at the location of the already cut down wires Nicholas PALMER and CS-02 exited the van to gather the cut down Verizon utility wires. While Nicholas PALMER and CS-02 gathering the wires, Paige EISEMAN was seen driving the van from the location of the cutting to a parking lot where she parked. After a short amount of time Paige EISEMAN drove back to the closed portion of Taylorsville Road to pick up Nicholas PALMER, CS-02, and the cut pieces of wire. Once the Verizon Utility wires were loaded into the van Paige EISEMAN drove Nicholas PALMER and CS-02 back to 59 Tapered Oak Lane, Levittown, Pennsylvania.

RECORDED CONVERSATION (Potts)

During the month of July 2023, CS-02 contacted Ryan POTTS on telephone number (267)560-6222. During the conversation Ryan POTTS told CS-02 that he did not want to go back to Taylorsville Road again to take more wire from the location. Ryan POTTS described that he found a new location for him and the members of his organization to cut Verizon utility wires. While talking about his organization Ryan POTTS explained how he showed Nicholas PALMER the do's and don'ts with cutting utility wires. Ryan POTTS offered CS-02 to be part of the organization and asked if CS-02 could get or rent a van for Ryan POTTS.

RECOVERED WIRE (Lee / Potts)

On July 27, 2023, Officers from the Bristol Township Police Department responded to a wooded area at Mile Street, Bristol, Bucks County, Pennsylvania, for a report of a brush fire. When arriving in the area your affiant (O'Brien) watched as Frederick LEE drove away from the scene in his van. Law enforcement went to the location of the burn and found a large pile of Verizon Utility wire smoldering along with multiple tools (Pictured in Photo Group 4). The wire was recovered and transported as evidence.



(Photo Group 4)

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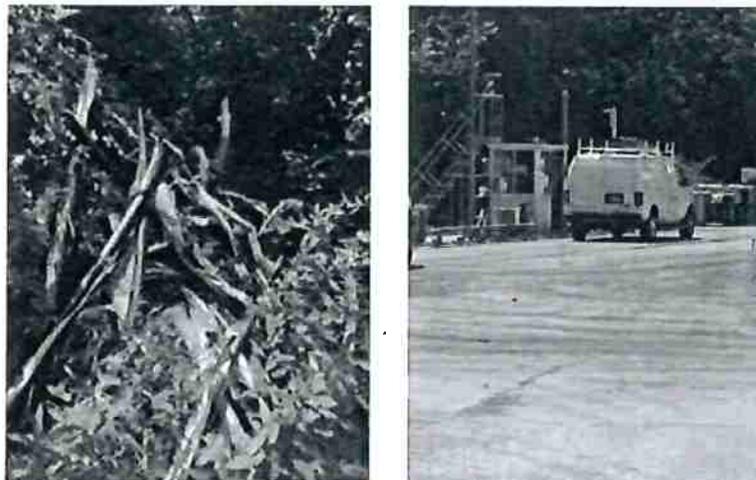
RECORDED CONVERSATION (Potts / Harkins)

During the month of August 2023 Ryan POTTS asked CS-01 to assist him in going to EMR to scrap or sell burned Verizon utility wires. After meeting with Ryan POTTS and Marianna

HARKINS CS-01 was told that the wire had already been transported to and sold at EMR and the two no longer CS-01 to transport it.

SURVEILLANCE (Lee)

During the month of August 2023, surveillance followed Frederick LEE from his residence at 57 Rocky Pool Lane Levittown, Bucks County, Pennsylvania to the area of Cabot Boulevard and Old Oxford Valley Road Langhorne, Bucks County, Pennsylvania. Frederick LEE parked his van on the side of the roadway and walked from his vehicle into the wooded area off of the roadway. After a short period of time Frederick LEE returned to his van and placed an unknown item in the back of the van. After closing the rear doors Frederick LEE returned to the driver seat and drove away. Once clear of the area law enforcement checked the wooded area Frederick LEE went into and observed a large pile of outer tubing used to conceal and cover the Verizon utility wires. The outer tubing (Pictured in Photo Group 5) had a cut in the middle and the inner copper communication wires were removed.



(Photo Group 5)

Frederick LEE was followed by surveillance directly to EMR (European Metal Recycling) at 2704 Veterans Highway Bristol, Bucks County, Pennsylvania. Frederick LEE met with an employee at the business (Pictured in Photo Group 5) and later unloaded metal from his vehicle. Frederick LEE then walked into the businesses building where he received a monetary payment for the metal.

ATTEMPTED BURNING / SCRAP (Cronon / Eiseman)

During the month of August 2023, Paige EISEMAN contacted CS-01. She told CS-01 that she had a large amount of Verizon utility wire inside of her (EISEMAN) rented U-Haul van and asked if CS-01 knew of a safe place to burn the plastic coating off of the wire. During a follow up conversation Paige EISEMAN told CS-01 that she and Michael CRONON were going to take the wire to a location in the area of the Philadelphia Mills Mall to do a "burn".

Once this information was received surveillance, later watched as Paige EISEMAN and Michael CRONON walked out of her residence at 59 Tapered Oak Lane Levittown, Bucks County, Pennsylvania, and entered the U-Haul van. Paige EISEMAN and Michael CRONON were then followed to the area of the Philadelphia Mills Mall where they parked at the Life Storage facility located at 4340 Byberry Road, Philadelphia, Pennsylvania. Michael CRONON and Paige EISEMAN met with an unknown male and the three walked into the wooded area with back packs on. The three walked back and forth from the vehicle to the wooded area multiple times.

RECORDED CONVERSATION (Eiseman)

During the month of August 2023, CS-01 under law enforcement instruction went to Paige EISEMAN's residence at 59 Tapper Oak Lane, Levittown, Bucks County, Pennsylvania. CS-01 was provided with pre-recorded United States currency and instructed to ask for methamphetamine from Paige EISEMAN. While at the residence and meeting, Paige EISEMAN again told CS-01 that she had a van full of "wire" (Verizon utility wire) and was still looking for a safe location to burn the wire. Paige EISEMAN and CS-01 walked over to the rear of the U-Haul van Paige EISEMAN was previously seen driving and Paige EISEMAN opened the rear doors of the van. Inside of the van CS-01 was shown a large amount of Verizon utility wire with the outer casing removed and ready to have the plastic coating burned off.

After seeing the wire Paige EISEMAN and CS-01 entered the residence. After a short amount of time Paige EISEMAN and CS-01 walked out of the residence and continued to talk about locations to burn the stolen wire. Paige EISEMAN played a voicemail from her cellular telephone for CS-01 from U-Haul. The voicemail being played was from a representative from U-Haul explaining that the U-Haul van used to store the stolen Verizon utility wires was going to be reported stolen if the vehicle was not returned. Paige EISEMAN stated that she was going to remove the vinyl (U-Haul brand) and change the license plate on the rented vehicle.

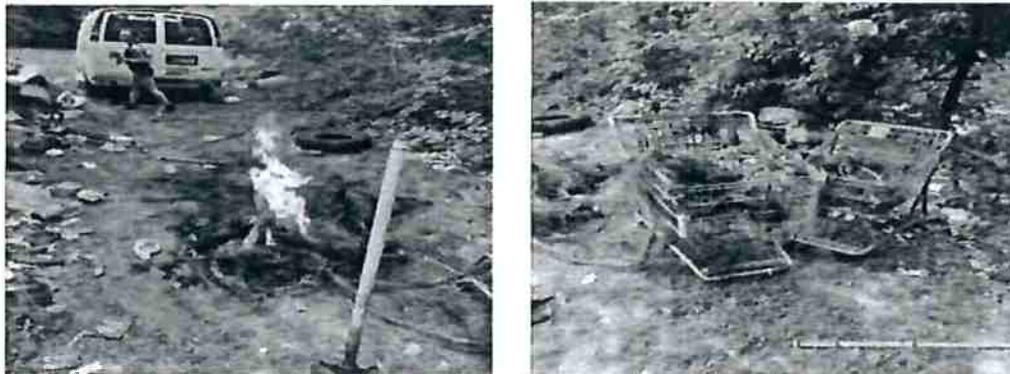
At the conclusion of the meeting CS-01 drove away from the residence and met with your affiant (Eisenhauer). When meeting CS-01 immediately turned over a clear bag with suspected methamphetamine. A representative from U-Haul provided information that the van rented by Nicholas PALMER and being driven by Paige EISEMAN was going to be reported stolen since it was past the vehicles rental time.

BURNING / WIRE RECOVERY (Eiseman)

During the month of August 2023, Officer Edmond O'Brien was told by CS-01 that Paige EISEMAN was taking the U-Haul van with the Verizon Utility wire to 4701 Newportville Road, Levittown, Pennsylvania, to burn the wire. After receiving the information your affiant (Grebloski) located the U-Haul van in the back of 4701 Newportville Road, Levittown, Bucks County, Pennsylvania, which is a vacant residence. While walking in the rear of the residence your affiant (Grebloski) observed Paige EISEMAN standing next to an open fire with the U-Haul van back doors open. In the yard with Paige EISEMAN there was a large amount of Verizon utility wire in shopping carts waiting to be burned and Verizon utility wire on the ground with the plastic coating being burned. (Pictured in Photo Group 6) With the rear door of the van

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opened a large amount of Verizon utility wire was observed in the van under a cover and along with hand tools consistent with tools used to take down and cut Verizon utility wires.



(Photo Group 7)

The van was secured and towed to Bristol Township Police Headquarters where a search warrant was later executed on the vehicle. The search warrant concluded with evidence of a large amount of stolen Verizon utility wire, tools used to cut the wires, methamphetamine, prescription medication, and drug paraphernalia consistent with the sales of methamphetamine. (Pictured in Photo Group 8)



(Photo Group 8)

TRAFFIC STOP (Lee)

On August 5, 2023, Officer Andrew Nagle of the Upper Makefield Police Department was patrolling the area of Taylorsville Road and Mt. Eyre Road, Bucks County, Pennsylvania. While patrolling this area he observed Frederick LEE driving his white in color van. Officer Nagle stopped Frederick LEE for a traffic violation. During the traffic stop Frederick LEE consented to a search of his vehicle. During the vehicles search suspected drugs, drug paraphernalia, and a gun holster were located within the vehicle.

When checking the area of the stopped vehicle a large piece of cut Verizon utility wire, and a wire cutting tool known as “loppers” were found still attached to the overhead wires. (Pictured in Photo Group 9)



(Photo Group 9)

As a result of observing these items of evidence the vehicle was scoured and Frederick LEE was transported to the Upper Makefield Police Department. While at the Upper Makefield Police Department Frederick LEE told Officer Andrew Nagle that the van was his and was only registered in the name of Haley JAZLOVIETCKI because his Pennsylvania driver’s license is suspended, and he cannot register the vehicle in his name.

A search warrant was later obtained for the contents of the van. The items recovered during the search included tools for cutting wires, a camera, ammunition, and a wallet with the identification of Haley JAZLOVIETCKI, Paige EISEMAN, and Ryan POTTS.

RECORDED CONVERSATION (Eiseman)

During the month of August 2023, Paige EISEMAN asked CS-01 to take her to the Bristol Township Police Department to pick up some of her belongings that were left in the U-Haul van. Surveillance watched as Paige EISEMAN was picked up by CS-01 from her residence at 59 Tapered Oak Lane Levittown, Bucks County, Pennsylvania. While driving Paige EISEMAN stated that the Verizon utility that was discovered in the U-Haul van was wire that was cut around Taylorsville Road, Lower Makefield, Bucks County, Pennsylvania.

Furthermore, during the conversation Paige EISEMAN told CS-01 that the U-Haul van being used as a form of transportation and a storage facility for the stolen Verizon utility wires by the organization was her vehicle and she was upset because tools belonging to her, Christopher HANNAH, and Sherri MARTINDALE including wire cutters, loppers, and other tools were inside of the van.

Paige EISEMAN said she and Nicholas PALMER had gone out with Ryan POTTS to cut Verizon utility wires down and also met with Ryan POTTS at different cutting locations in the past and had utilized the U-Haul van for the cuttings. Paige EISEMAN further gave details about a member of the organization named “Phil” who would drive Ryan POTTS around to cut the Verizon utility wires.

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When discussing the items in the U-Haul van Paige EISEMAN stated that she had “an ounce of meth, K-pins, and \$3,000.00 (Scrapped value) worth of copper wire” that was hers inside of the U-Haul.

INTERVIEW (Eiseman)

During the month of August an interview was conducted on Paige EISEMAN who was not in custody and was free to leave, told that she and Michael CRONON went to the area of what she described as Taylorsville Road, Lower Makefield, Bucks County, Pennsylvania a few times to cut the Verizon utility wires. This information was corroborated by GPS tracking information where Michael CRONON is ordered by Bucks County Probation to be monitored by an ankle GPS tracking device. Paige EISEMAN provided false details during this interview to include that Michael CRONON was involved in the wire burning on August 4, 2023, where the wire and U-Haul van were recovered. The Bucks County Probation GPS tracker confirmed that this information provided by Paige EISEMAN was not truthful.

Paige EISEMAN confirmed that Ryan POTTS was also involved in the cutting of the Verizon utility wires.

WIRE SCRAP / PAYMENT (Potts / Machen)

During the month of August 2023, Ryan POTTS and Richard MACHEN asked CS-01 for a ride to EMR because he (POTTS) had a backpack of wire that needed to be sold to EMR. Surveillance watched on this day as CS-01 picked up Ryan POTTS and Richard MACHEN to drive them to EMR. Ryan POTTS was seen weighing and selling the Verizon utility wire that was inside of a backpack to EMR on this day. A payment and receipt were given to Ryan POTTS for the scrap wire.

GPS LOCATIONS (Cronon)

As mentioned, Michael CRONON, a member of the organization was being monitored Bucks County Adult probation using an ankle GPS tracking device as ordered by the Bucks County Court for an unrelated criminal act. Upon request that GPS device showed that between July 7, 2023, and August 16, 2023, Michael CRONON spent many hours in the area of Taylorsville Road Lower and Upper Makefield, Bucks County, Pennsylvania in the area of the Verizon utility wire cutting locations. On many of the occasions Michael CRONON was in these areas in the late night / early morning hours.

Your affiants (Grebloski and O'Brien) went to the locations where Michael CRONON's GPS traveled to in the area of Taylorsville Road, at Crossing Farm Lane, Washington Crossing, Bucks County, Pennsylvania. In these areas the Verizon utility wires were cut from the utility poles (Pictured in Photo Group 10). The outer casing for the Verizon wire was located on the side of the roadway, in the wooded area also where the GPS tracking device placed Michael CRONON many times.

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(Photo Group 10)

An additional location shown by Bucks County Probation GPS data showed Michael CRONON frequented Lynbrook Drive, Hopewell Township, New Jersey. At the end of a dirt road, law enforcement found a burn site similar to the other burn sites. In the area of the burn site your affiants (Grebloski and O'Brien) clearly observed numerous strands of colored wire identical to the stolen Verizon utility wires on the ground.

BURNING / SCRAP (Potts / Machen)

During the month of August 2023, CS-01 reported that Ryan POTTS had contacted him / her and asked for help and a ride to burn and sell stolen Verizon utility wire. While conducting surveillance your affiant (Grebloski) watched as CS-01 arrived to the residence at 430 Washington Street, Bristol, Bucks County, Pennsylvania. Surveillance watched as Ryan POTTS and Richard MACHEN loaded a large cooler into the back of a vehicle. Surveillance followed as the vehicle that was occupied by Ryan POTTS and Richard MACHEN drove directly to the rear of the Valero Gas station at 905 Bristol Pike Bristol, Bucks County, Pennsylvania. Ryan POTTS and Richard MACHEN removed the cooler from the vehicle and walked further into the wooded area behind the gas station.

While in the wooded area Ryan POTTS and Richard MACHEN conducted a "burn" of the Verizon utility wire that was stored inside of the large cooler. After a short amount of time consistent with the amount of time it takes to burn utility wire Ryan POTTS and Richard MACHEN walked out of the wooded area carrying the cooler and again loaded it into a vehicle. Law enforcement later checked the area of the burn and noticed a fresh burn area with strands of wire on the ground (Pictured in Photo Group 11).



(Photo Group 11)

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The vehicle was then followed to EMR where Ryan POTTS and Richard MACHEN removed the wire from the vehicle and placed it on the table scale to be weighed. Once the wire was weighed Ryan POTTS threw the Verizon utility wire in a box, walked into the business and received a payment for the stolen utility wire.

BURNING / SCRAP (Potts)

During the month of August 2023, CS-01 provided details and information that Ryan POTTS and members of the organization had cut Verizon utility in the area of Jefferson Avenue Bristol Borough, Bucks County, Pennsylvania. This information was confirmed after seeing that the wires were cut at this location and missing (Pictured in Photo Group 12).



(Photo Group 12)

CS-01 provided additional details that Ryan POTTS was asking for a ride and looking for someone to help him burn Verizon utility wires. Under the supervision of law enforcement CS-01 drove to 430 Washington Street, Bristol, Bucks County, Pennsylvania and was greeted by Ryan POTTS. Surveillance watched as Ryan POTTS put a suitcase and two tool bags into the rear of a vehicle. The suitcases were both heavy in weight and were later confirmed to be filled with stolen Verizon utility wires.

Surveillance followed CS-01 and Ryan POTTS to a burn location which was in the wooded area next to Set Rite Corporation at 5790 Bristol Pike, Bristol, Pennsylvania. While driving to the burn location Ryan POTTS provided details of how he and Marianna HARKINS had a LYFT driver take him the night before to a location to cut the wires. After cutting the wires Ryan POTTS advised that he had the LYFT driver assist in loading the cut wires into the vehicle at which point Ryan POTTS offered the driver a position within the organization.

When arriving at the parking lot of the burn location Ryan POTTS noticed a rodent walking. Ryan POTTS told CS-01 that he had a gun and was going to shoot the rodent. Ryan POTTS agreed to pay CS-01 to assist with the burning of the wires. Ryan POTTS explained that he had to also pay other members of the organization for their assistance in cutting the Verizon utility

wires from the pole the night before. Ryan POTTS further explained that he was the one that climbed the pole to cut the stolen wires.

Your affiant (O'Brien) watched as CS-01 and Ryan POTTS removed the suitcase and the two tool bags from the rear of the vehicle and dragged them into the wooded area to the burn location. Ryan POTTS removed Verizon utility wire from the bag and placed it onto a shopping cart where he began to burn the wire (Pictured in Photo Group 13).



(Photo Group 13)

While burning the wire Ryan POTTS told CS-01 that it was just he and Marianna HARKINS who cut the stolen Verizon utility wire that he was burning. Ryan POTTS identified his leadership in the organization and identified the organization as "GMS" (Get Money Squad). Ryan HARKINS told CS-01 that his aunt "Kim" identified as Kimberly MAYGER was a member of his organization and was also cutting Verizon utility wires in and around Bucks County, Pennsylvania. Ryan POTTS told CS-01 that he did not care if people's phones and internet aren't working as a result of him cutting the Verizon utility wires. Ryan POTTS clearly explained that he can make a large profit from cutting and stealing Verizon utility wires and further explained his profits in cutting and stealing the wire and how he can make enough money to pay his rent in one night.

Ryan POTTS provided partial details about the organization and bragged that he has a connection with a worker at EMR. The worker was said to stay open later for him to bring additional wires. When the worker who was identified as Rocco noticed that Ryan POTTS was bringing in less weight of the stolen Verizon utility wires, he said something to Ryan POTTS about the lower amounts. Ryan POTTS also explained that when he drops the stolen wire off at EMR that it is taken directly into the incinerator to prevent law enforcement from seeing his evidence.

At the conclusion of burning the plastic off of the wire Ryan POTTS and CS-01 carried the burned wire in the suitcase and bags from the wooded area back to a vehicle and loaded it into the vehicle. Once copper wire was loaded the two drove directly to EMR. While driving to EMR Ryan POTTS removed his gun from his person unloaded it and placed it under the seat.

While at EMR Ryan POTTS greeted the worker he identified as "Rocco". The vehicle was seen by surveillance backing into a spot at the building of the business, where the burned wire was unloaded. Ryan POTTS then exited the vehicle and walked into the business where he was given a receipt and a payment for the scrapped stolen Verizon utility wire.

Ryan POTTS provided CS-01 with a payment for helping him. Ryan POTTS told CS-01 that he has to also pay \$150.00 to a driver who assisted and drove him to cut the wires. Ryan POTTS also stated that he had to pay Marianna HARKINS for assisting with the wire cutting for the scrap wires.

ATTEMPT TO RECOVER EVIDENCE (Harkins)

On August 17, 2023, your affiant (O'Brien) was called by Marianna HARKINS who said she was calling about the cell phone that was left in the woods on July 1, 2023. Marianna HARKINS said that the phone was hers and requested it be returned to her. It was explained that the phone was found at the scene of a crime and that it was being held for an investigation. Marianna HARKINS provided false information that a homeless male by the name of Lee DIONNE was using her phone and he must have been the person who left the phone there.

ATTEMPTED THEFT /CUTTING (Potts)

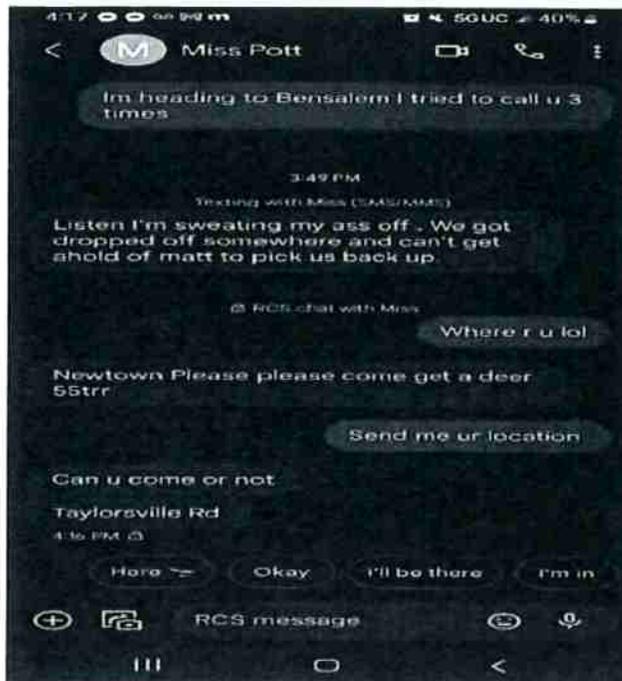
On August 25, 2023, at 1:19 a.m., Bristol Township Police Officer Kevin Jackson #157 attempted to conduct a pedestrian stop on a male subject who was riding a bicycle in the Bucks County Business Center, 1200 Veterans Highway, Bristol, PA 19007. The male fled from Officer Jackson and discarded a green duffle bag and the bicycle while attempting to be stopped. The discarded abandon bag was found to contain cutting tools such as loppers, climbing gaffs, and other equipment consistent with tools used to climb and cut Verizon utility wires. In addition to the tools the bag also contained a plastic face mask with red LED lighting.

CS-01 said Ryan POTTS told how he was chased by "Officer Jackson" and that he (POTTS) ran to a yard on Llanberis Avenue after ditching his tools and other items. CS-01 described one of the other items as the face mask that was found in the bag in detail and reported that multiple people within the POTTS and HARKINS Theft Organization wear the mask when cutting and stealing Verizon utility wires.

ATTEMPTED THEFT /CUTTING (Potts)

During the month of August 2023, CS-01 contacted your affiant (O'Brien) and explained that he / she was contacted by Marianna HARKINS (Pictured in Photo Group 14), who explained that she and Ryan POTTS were on Taylorsville Road, Upper Makefield, Bucks County, Pennsylvania. Marianna HARKINS further explained that she, Ryan POTTS and other members of the organization were in this area to cut Verizon utility wires when one of the members of the organization left in their vehicle leaving Ryan POTTS and Marianna HARKINS abandoned. Ryan POTTS and Marianna HARKINS were not picked up and the two slept within the wooded area on this day.

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(Photo Group 14)

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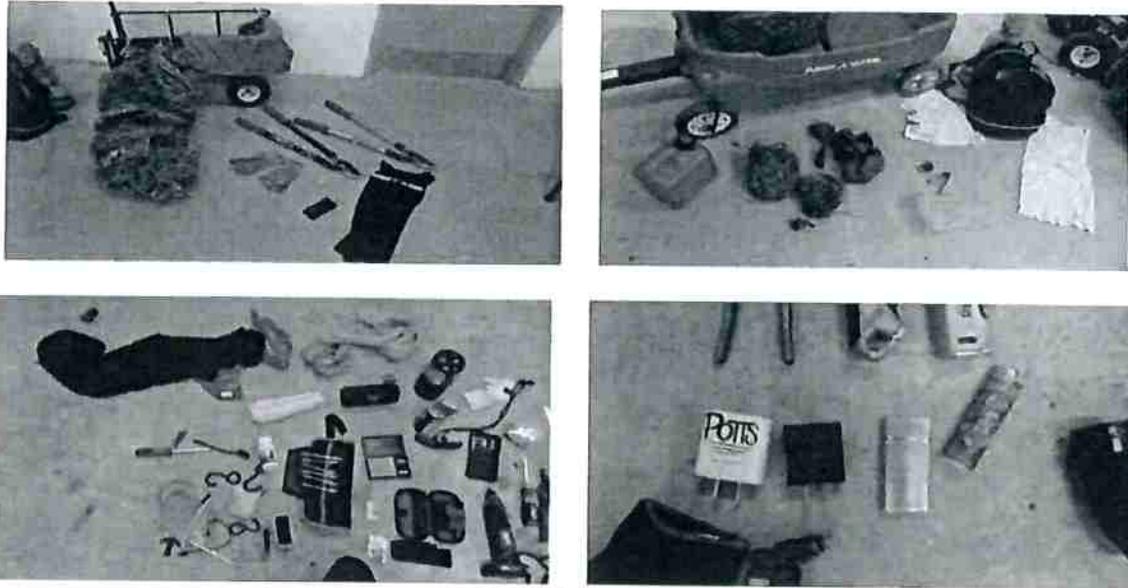
ATTEMPTED THEFT /CUTTING (Potts/ Mayger/ Lopresti)

On August 30, 2023, at 12:12 a.m., law enforcement from the Upper Makefield Police department observed a suspicious person identified as Kimberly MAYGER, walking on the roadway in the area of Taylorsville Road at Crossing Farm Lane. This area was previously identified as a location targeted by the organization for Verizon utility wire thefts. Kimberly MAYGER reported that she was looking for her nephew, Ryan “Glasson” (confirmed to be Ryan POTTS) who was walking the canal path with his girlfriend. Kimberly MAYGER explained that she was driven to the area by a friend “Dave” in a black Ford F-150, parked in the area of Amber Beech Kennel. Law enforcement found the David LOPRESTI and the Ford F150 which had a large amount of wire insulation of various colors within the F150 truck bed. David LOPRESTI identified the wire as wire he scraps from area construction sites.

EVIDENCE RECOVERED (Potts/ Harkins)

On August 30, 2023, after talking with Kimberly MAYGER law enforcement checked the area of the canal path along Taylorsville Road, Upper Makefield, Bucks County, Pennsylvania. Law enforcement found two abandoned carts in the area of the canal path. Located within the abandon carts were loppers (wire cutting tool) and a large piece of cut Verizon utility wire in one cart. The second abandoned cart was a red wagon with a backpack, a gas can, and a cooler bag. An additional Craftsman tool bag, hooded shirt, flashlight, and black backpack were also found abandoned in the wooded area in the same area as the carts.

After recovering the abandon property, a check of the bags revealed a large amount of Verizon utility wire that was removed from the exterior casing and not yet burned, additional wire that was burned with the plastic coating removed, loopers (tools for cutting wire) additional tools for cutting wires, digital meters, syringes, digital scale, and a charger with "POTTS written on it (Pictured in Photo Group 15).



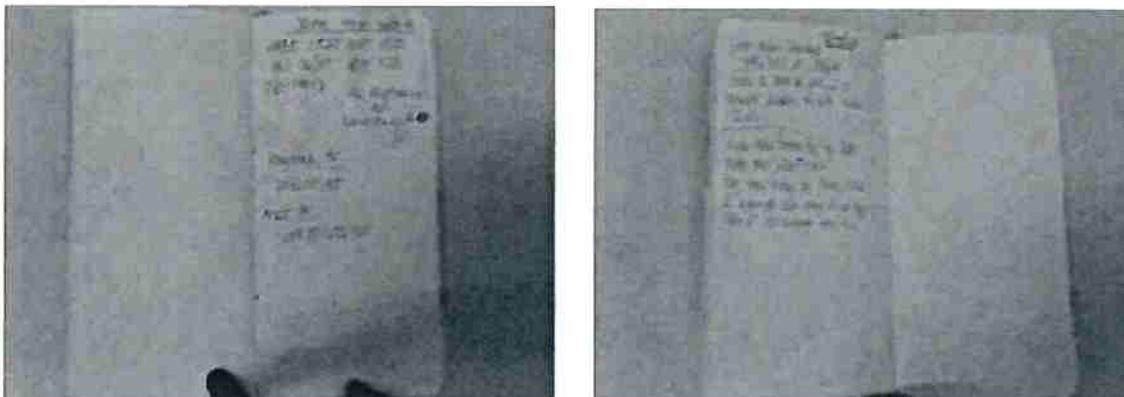
(Photo Group 15)

Within the backpack found in the red wagon was a female's shirt, markers, and a notebook. On the cover of the notebook was handwritten the word Marianna / Marianna above a heart shape above the word "Ryan" and the word "Lotus" above a heart shape above the word "King" (Pictured in Photo Group 16).



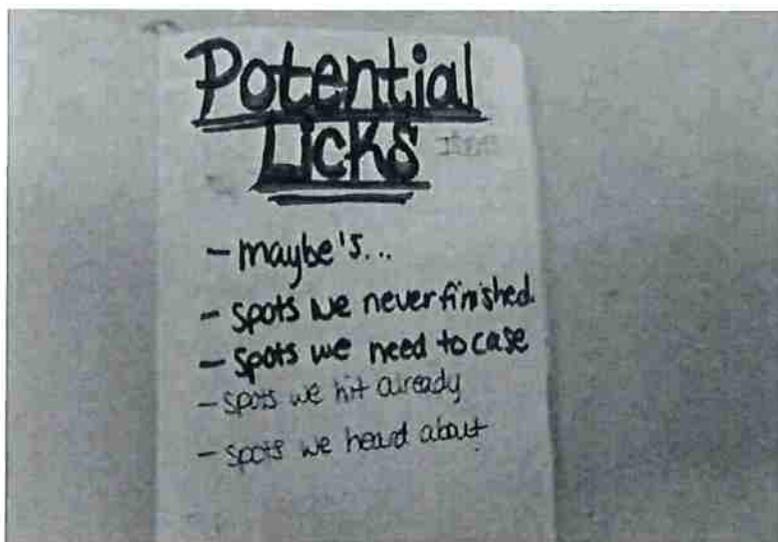
(Photo Group 16)

The notebook was found to have the personal information of Marianna HARKINS (Pictured in Photo Group 17).



(Photo Group 17)

Further review of the contents inside of the book showed that the book had handwritten notes and information for the POTTS and HARKINS theft organization. It identified locations titled "Potential Licks" as future cutting / theft locations (Pictured in Photo Group 18).



(Photo Group 18)

The information in the book also listed many locations in Bucks County, Pennsylvania with notes about those locations. These locations have been confirmed to be areas where Verizon utility wires had been cut and stolen from.

Additionally, the book showed notes about the members of the organization and listed the members of the organization used during different dates and times to cut, remove, strip, steal, and sell the stolen Verizon utility wire. A portion within the book listed "EMR Scrapyard Tickets" showed dates, payment receipts, and weighed amounts of the stolen wire that was taken to EMR.

RECORDED CONVERSATION (Harkins)

During the month of August 2023, Marianna HARKINS contacted CS-01 to drive her and Ryan POTTS to the area of Taylorsville Road, Upper Makefield, Bucks County, Pennsylvania. CS-01 said Marianna HARKINS was panicking after she and Ryan POTTS left items including wire cutting tools and backpacks in Upper Makefield and needed to retrieve those items. CS-01 reported that Marianna HARKINS was afraid of law enforcement finding the backpacks and what was inside of the backpacks, stating to CS-01 that if law enforcement found the backpacks that she and Ryan POTTS were "fucked".

During a follow up conversation Marianna HARKINS explained that she was at a residence in Bensalem, Bucks County, Pennsylvania, and was no longer abandoned in Upper Makefield, Bucks County, Pennsylvania. Marianna HARKINS told CS-01 that she needed to get money for methamphetamine (tina) and a ride to Taylorsville Road, Upper Makefield, Bucks County, Pennsylvania, to retrieve the items she and Ryan POTTS left behind.

BURNING / SCRAP (Potts / Lee / Mayger / Harkins / Paul)

During the month of September 2023, CS-01 contacted your affiant (O'Brien) to report that Ryan POTTS and Frederick LEE were out cutting Verizon utility wires the night before. When checking the GPS tracker location on Frederick LEE's van it showed that the vehicle was on State Road at American Drive, Bensalem, Bucks County, Pennsylvania, on September 7, 2023, at 0503 hours. A check of the area of State Road at American Drive, Bensalem, Bucks County, Pennsylvania confirmed that Verizon utility wires were cut from the utility poles and stolen from this area (Pictured in Photo Group 19).

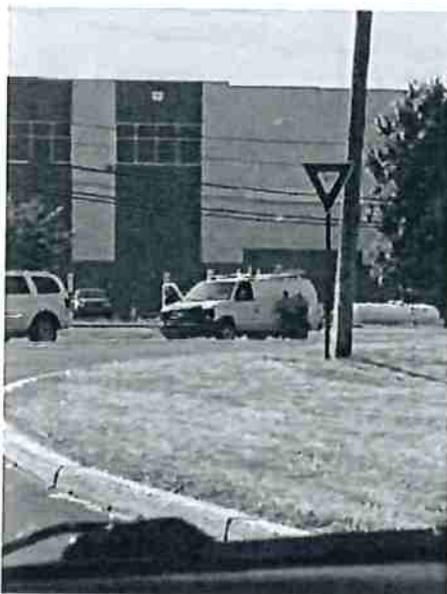


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(Photo Group 19)

After receiving this information Frederick LEE's van was found by surveillance parked on the shoulder of Route 413 (northbound) at State Road, Bristol, Bucks County, Pennsylvania.

Frederick LEE was in the driver's seat and Ryan POTTS was in the passenger seat. Surveillance watched as Kimberly MAYGER walked into the parking lot of the wawa gas station and took possession of a gas can and filled it at the gas pumps. Ryan POTTS, Frederick LEE, and Kimberly MAYGER, and Marianna HARKINS were all observed to be together at this time. After getting gas Kimberly MAYGER returned to the van where Ryan POTTS used the can to add gas to Frederick LEE's van (Pictured in Photo Group 21).



(Photo Group 21)

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After putting gas into the vehicle Ryan POTTS, Frederick LEE, Kimberly MAYGER, and Marianna HARKINS who were all in Frederick LEE's van were followed to the wooded area behind Bristol Borough Public Works at 92 Maple Beach Rd, Bristol, Bucks County, Pennsylvania.

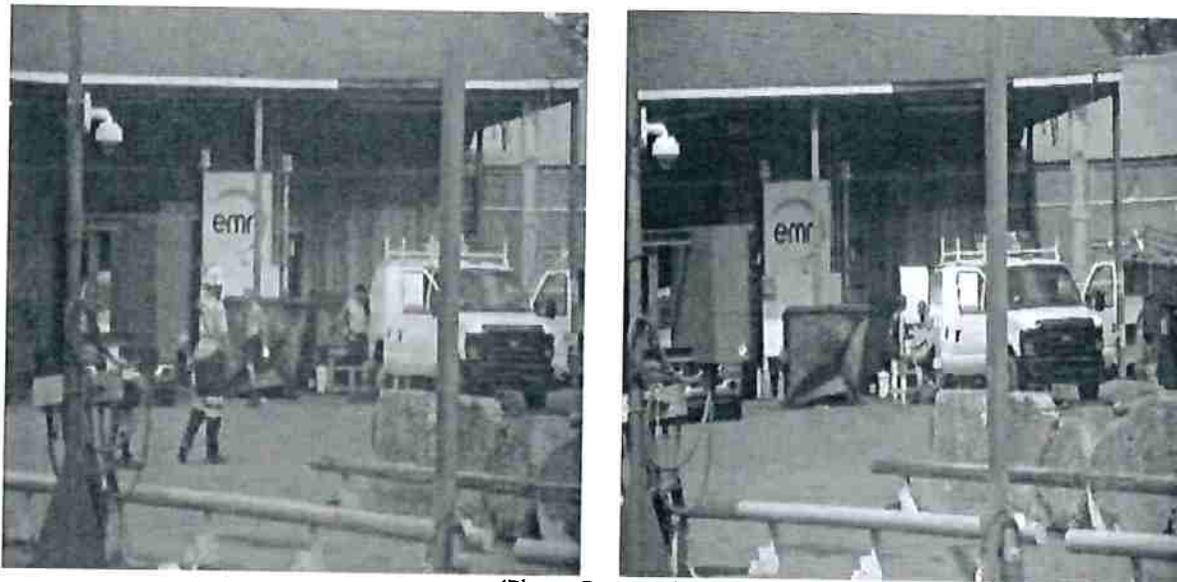
Surveillance watched as the members of the organization walked into the wooded area carrying different items believed to be stolen Verizon utility wires. Ryan POTTS and Frederick LEE were observed dragging a heavy duffle bag into the wooded area. While the members of the organization went into the woods to do the "burn" an additional member of the organization who was an unknown male on a bicycle, and pulling a wagon arrived to assist by carrying a gas can into the wooded area.

Surveillance watched as Ryan POTTS, Marianna HARKINS, and Kimberly MAYGER began to burn the Verizon utility wires. As a result of thick smoke emitting from the burning wires the Fire Department was contacted by an unknown person and requested to respond to the area for an investigation related to heavy black smoke.

Surveillance watched as Kimberly MAYGER left the area riding a bicycle out of the woods. Marianna HARKINS contacted CS-01 and requested him/her to come to the area of Maple Avenue to pick them up, and that they heard the fire siren going off. Ryan POTTS met with CS-01, entered his / her vehicle, and directed CS-01 to go to the Public Works building. Surveillance

watched at the Bristol Public Works building, as Frederick LEE Ryan POTTS, and Raymond PAUL loaded burned Verizon utility wire into CS-01's vehicle. Ryan POTTS and Raymond PAUL entered CS-01's vehicle. CS-01 with Ryan POTTS and Raymond PAUL in his / her vehicle then drove as instructed to EMR with Frederick LEE and Marianna HARKINS following in Frederick LEE's vehicle.

While at EMR Ryan POTTS and Raymond PAUL (Pictured in Photo Group 22) removed the burned wire from CS-01's vehicle, weighed it and then placed it in the bin. Ryan POTTS and Marianna HARKINS (Pictured in Photo Group 22) were observed taking wire out of Frederick LEE's vehicle where it was also weighed and then placed into the bin. After the organization members received a payment for the stolen Verizon utility wires Frederick LEE, Ryan POTTS, Marianna HARKINS, and Raymond PAUL left the area in Frederick LEE's van.



(Photo Group 22)

LOSS AMOUNT

The theft / cutting areas mentioned throughout this affidavit of probable cause as areas where Verizon utility wires were taken from without the permission of Verizon was assessed for the damage and loss to Verizon. Verizon employees estimate the cost of the damage to Company property and the cost of repair has resulted in a loss to Verizon in excess of \$250,000.00. This amount does not include loss of services to customers.

CONCLUSION:

Your Honor, based upon the details and information provided within this affidavit of probable cause, your affiants submit that the POTTS and HARKINS theft organization has been operating in Bucks County, Pennsylvania, since prior to June 2023. Members of this theft ring have been damaging, taking, possessing, and selling Verizon property without permission and for a shared group profit in and around Bucks County, Pennsylvania. These crimes have not only deprived

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Verizon of property. They have also deprived crucial utility service to Verizon customers, including, but not limited to, access to 911.

Members of this organization disguised themselves as participants assisting in the search for children swept away during fatal flooding in order to get away with their crimes. To further protect themselves from discovery and to prevent capture, some members armed themselves with a firearm during their crimes.

Based on the facts listed within this affidavit of probable cause your affiants respectfully request that the member listed in this affidavit as defendant Ryan POTTS and identified as a member of the POTTS and HARKINS theft Organization be issued an arrest warrant in his name.

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