

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA

VS.

Magisterial District Number:  
MDJ: Hon. Philadelphia Arraignment  
Address: 1301 Filburt Street  
Philadelphia, PA 19106

DEFENDANT:

(NAME and ADDRESS):

RASHEEN  
First Name

EDGAR  
Middle Name

CREWS  
Last Name

Gen

1412 S. 51st Street  
Philadelphia, PA 19143

Telephone: (215)683-7283

NCIC Extradition Code Type

- |  |   |  |  |
|--|---|--|--|
| <input checked="" type="checkbox"/> 1-Felony Full    | <input type="checkbox"/> 5-Felony Pending Extradition         | <input type="checkbox"/> C-Misdemeanor Surrounding States  | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited            | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition      |  |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full                   | <input type="checkbox"/> E-Misdemeanor Pending Extradition |  |
| <input type="checkbox"/> 4-Felony No Extradition     | <input type="checkbox"/> B-Misdemeanor Limited                | <input type="checkbox"/> F-Misdemeanor Pending Extradition |  |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed	OTN/LiveScan Number	Complaint Number 41265	Incident Number 41265	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/13/1976	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>	Gen.
First Name		Middle Name		Last Name	
AKA					
RACE	<input type="checkbox"/> White	<input type="checkbox"/> Asian	<input checked="" type="checkbox"/> Black	<input type="checkbox"/> Native American	<input type="checkbox"/> Unknown
ETHNICITY	<input type="checkbox"/> Hispanic	<input type="checkbox"/> Non-Hispanic	<input checked="" type="checkbox"/> 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 checked="" type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input checked="" type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)
	<input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color	<input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input checked="" 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	<input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number		MNU Number			230
Defendant Fingerprinted	<input type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:					6 2

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <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).

THOMAS OST-PRISCO  
(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

11/15/2022  
(Date)

I, SEAN M. MCGLINN  
(Name of the Affiant)

572

(PSP/MPOETC -Assigned Affiant ID Number & Badge #

of Pennsylvania Office of Attorney General  
(Identify Department or Agency Represented and Political Subdivision)  
do hereby state: (check appropriate box)

PA0222400  
(Police Agency ORI Number)

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 [ ]  
(Subdivision Code) (Place-Political Subdivision)

in PHILADELPHIA County [51] on or about 02/15/2019 - 03/15/2019  
(County Code)





# POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: RASHEEN	Middle: EDGAR	Last: CREWS

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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input checked="" 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	4101	(a)(1,2,3	of the	18 PA CSA	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense 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 statute or ordinance): **CRIMINAL SOLICITATION TO COMMIT FORGERY**

Acts of the accused associated with this Offense: With intent to defraud or injure anyone, or with knowledge that he is facilitating a fraud or injury to be perpetrated by anyone, the actor:(1) alters any writing of another without his authority;(2) makes, completes, executes, authenticates, issues or transfers any writing so that it purports to be the act of another who did not authorize that act, or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed; or(3) utters any writing which he knows to be forged in a manner specified in paragraphs (1) or (2) of this subsection. Rasheen Crews did take several thousand dollars from multiple judicial candidates in the 2019 Philadelphia Primary Election, with the promise of obtaining signatures on behalf of the judicial candidates for their Petitions to Nominateand. Investigation revealed that Crews entered into agreements with several people to forge signatures on many of the Petitionns to Nominate.

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	3927	(a)	of the	18 PA CSA	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense 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 statute or ordinance): **THEFT BY FAILURE TO MAKE REQUIRED DISPOSITION OF FUNDS RECEIVED**

Acts of the accused associated with this Offense: A person who obtains property upon agreement, or subject to a known legal obligation, to make specified payments or other disposition, whether from such property or its proceeds or from his own property to be reserved in equivalent amount, is guilty of theft if he intentionally deals with the property obtained as his own and fails to make the required payment or disposition. Rasheen Crews did take several thousand dollars from multiple judicial candidates in the 2019 Philadelphia Primary Election, with the promise of obtaining signatures on behalf of the judicial candidates for their Petitions to Nominateand. Investigation revealed that Crews entered into agreements with several people to forge signatures on many of the Petitionns to Nominate.

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"/>				of the					
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense 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 statute or ordinance):

Acts of the accused associated with this Offense:









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## AFFIDAVIT of PROBABLE CAUSE

Your Affiant, SSA Sean M. McGlenn #572, of the Pennsylvania Office of Attorney General (PAOAG) Bureau of Criminal Investigations (BCI) is presently working as an agent in the Bureau of Criminal Investigations, Criminal Prosecution Section.

In September, 2019, the Office of Attorney General opened an investigation regarding conduct involving ballot access for Philadelphia's Primary Election in May 21, 2019. The allegations were: Rasheen Crews, a political consultant, was paid to obtain signatures to help candidates get on the Democratic Ballot for the May 21, 2019 Primary Election. However, instead of obtaining legitimate signatures, it was alleged that Mr. Crews either personally forged or hired individuals to forge signatures in order to obtain the requisite amount of legally required signatures for ballot access in contravention of the Pennsylvania Election Code.

From the Pennsylvania Department of State, Affiant obtained Copies of Pennsylvania Petition pages pertaining to all Commonwealth of Pennsylvania 2019 Nomination Petitions, Democratic Party, for all Primary races in the city and county of Philadelphia.

Through the course of the investigation it was learned that the defendant, Rasheen Crews, filed the petitions for several candidates on 03/12/2019, in Harrisburg, Dauphin County, Pennsylvania.

Affiant determined that the following candidates appeared to have utilized the services of Crews Consulting, which is the business name found on contracts provided to the Affiant by several candidates:

Candidates for the Philadelphia Court of Common Pleas: Lawrence Bozzelli, Anthony Kyriakakis, Vince Melchiorre, Jason Rubin, Henry Sias, Brian McLaughlin, Betsy Wahl and Gary S. Silver.

Candidates for Philadelphia Municipal Court: James Berardinelli, Francis McClosky Jr., George Twardy, Brian McLaughlin, Betsy Wahl and Gary S. Silver.

### CANDIDATES:

#### **Jason Rubin**

On 5/6/2021 at approximately 2:19PM, Affiant met with Jason Rubin, a candidate in the 2019 Primary Election, Philadelphia Court of Common Pleas. Rubin reported that he hired Crews/Mosely for petition work, one thousand signatures for a fee of \$2500.00. He believes there was a contract in place, but does not have a copy. The payment was made through his PAC, Committee to Elect Jason Rubin.

*(Signature)*  
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Rubin stated that he gave the petitions that he had completed on his own to Crews. These petitions were notarized by someone in his office prior to his giving them to Crews. He stated that a later review on the State's website revealed that at least two of the pages had names added to the petitions, after the pages were notarized and given to Crews by Rubin. Rubin stated that he did not see the petition pages prior to Crews submitting them in Harrisburg.

Rubin filed a claim against Crews in Philadelphia Municipal Court, SC-19-04-25-6097. Ultimately, there was a settlement that Crews would pay Rubin \$3,000.00. Rubin said that he received \$1410.00 of the three thousand owed him, but has not received a payment since September 2020. Under the conditions of the settlement Crews is supposed to be paying him \$290.00 a month until it is satisfied. Rubin was not aware that Crews was hired as Chief of Staff to the Register of Wills.

### James Berardinelli

On 5/6/2021 at approximately 11:00AM, the assigned met with James Berardinelli, a candidate in the 2019 Primary Election, Philadelphia Court of Common Pleas and Municipal Court. Berardinelli stated that he hired Crews/Mosely for petition work, 1200 signatures for Municipal Court Judge and 1200 signatures for Court of Common Pleas for a total price of \$4800.00. He paid Crews half up front with a check. Crews ultimately only supplied him with 1590 signatures, a little over 900 for Court of Common Pleas and the remainder for Municipal Court. Because of this Crews was only paid an additional \$780.00 and not the agreed upon \$2400.00.

Berardinelli stated that he was not aware of fraudulent signatures obtained by Crews, his issue with Crews was the contract he had with him was for a number of signatures and he did not get what was on the contract.

NOTE: Affiant viewed a copy of the signed contract between Berardinelli and Rasheen Crews. The contract, entitled Signature Acquisition Contract, states "Crews Consulting will acquire 1200 Common Pleas signatures and 1200 Municipal Court signatures, at a rate of \$2.00 per signature". The contract goes on to state that this will be done between 2/19/19 and 3/12/19 (completed no later than 3/5/19). Pages notarized is checked and initialed "RC". Filing in Harrisburg is checked, but not initialed. Payments to be made as follows: 50% of petition fees paid December 20<sup>th</sup>, 2019 (\$2400.00), 50% to be paid when final petitions are turned into the candidate (\$2400.00). The page is signed Rasheen Crews (Crews Consulting) 12/20/18 and by James Berardinelli 12/20/18

*Rasheen Crews*  
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Berardinelli also provided the Affiant with a copy of TD bank check, Committee to Elect James Berardinelli, #392, dated 12/20/2018, payable to Rasheen Crews in the amount of \$2400.00. The memo line states Crews Consulting, Petitions.

Berardinelli also provided the Affiant with a copy of TD bank check, Committee to Elect James Berardinelli, #167, dated 03/13/18 (appears to be a date typo), payable to Rasheen Crews in the amount of \$780.00. The memo line states Balance for Petitions.

### Vince Melchiorre

On 5/12/2021, Affiant and SA Liebttag met with Vince Melchiorre and his attorney, Gil Scutti. Melchiorre stated in summary that he ran for Judge, Court of Common Pleas, Philadelphia in 2019. He hired Omar Sabir, a person he knew as a political consultant and who was running himself for City Commissioner, to obtain petition signatures for him. He said that the agreement was \$3,000.00, for 1500 valid signatures with the papers signed by the circulator and notarized. Additionally, the papers would be filed in Harrisburg on behalf of Melchiorre. Melchiorre provided Omar Sabir with a Citizen's Bank check, dated 2/12/2019, for \$1500.00. The other \$1500.00 was supposed to be paid after the signatures were done.

Melchiorre said that he did not hire Crews, did not know Mosley, he hired Sabir. The Friday before the petitions were due in Harrisburg Melchiorre told Sabir that he was going to take the petitions to Harrisburg himself and file them. That was when Sabir informed him that he hired Crews to do the petition work for him.

Melchiorre said that the petitions that he did or friends did on his behalf were all signed by the circulators and notarized. Those notarized petitions were given to Sabir to file in Harrisburg for Melchiorre. After the petitions were filed Melchiorre drew the first position on the Democratic Ballot. He said that he saw an article about Crews having fraudulent signatures and he received a call from Bob Brady, who told him there was a challenge filed. Melchiorre said that he did not want his name associated with Crews and withdrew from the Primary Election.

Melchiorre paid the original \$1500.00 to Omar Sabir and not the second \$1500.00. Melchiorre told Sabir he thought Sabir should pay him back since he did not do what he was paid to do. Melchiorre was not paid back.

### Betsy Wahl

Wahl used Crews to obtain petition signatures for the 2019 primary election. She stated that she had a contract signed with him which states

*[Handwritten Signature]*  
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"Rasheen Crews of Crews, Mosely and Associates, will obtain 1500 CP and 1500 MC verified and notarized signatures on petitions for Betsy Wahl for Judge. Signatures will be compensated at \$1.50.00 for each for a total of \$4500.00 Rasheen Crews will also file all petitions in Harrisburg after they are verified, notarized and photocopied. Photocopies of signatures will be given to candidate Betsy Wahl prior to filing. All petitions will be completed and filed between 2/19/19 and 3/8/19".

This contract is signed by Betsy Wahl, dated 2/5/19 and by Rasheen Crews, dated 2/7/19.

In her statement Wahl explained that nothing was getting filed, and she never got the photocopies of signatures she was supposed to get. She was texting and calling Crews on the phone and then started showing up at his office. She observed other candidates at Crews' office looking for him also.

### Lawrence Bozzelli

Lawrence Bozzelli was interviewed by Affiant on 10/08/19. He stated in summary that he was given Crews' information as someone that could help with petitions. He contacted Crews and eventually worked out a verbal deal that he would pay him for one thousand signatures, two dollars a signature is what Crews told him. He stated that he paid an initial \$1,000.00 and then when the petitions were completed he was to pay the second \$1,000.00. He stated that he paid the first thousand and then he believes it was the day after filing, Crews called or texted him to bring the remainder of the payment. He went to Crews' office around 100 S. Broad and paid the remaining \$1000.00.

On the Sunday of the week that they "pulled the numbers" he received a call from a Joe Russo Sr., who told him that Crews screwed the petitions up. Bozzelli went on line and checked the petitions. He recalls seeing the name Seth Bishop approximately three times in different handwriting. He also recalled that his mother had told him that her petition papers were not completely filled in. He believes additional names had been written on the petitions his mother had completed for him. He felt uncomfortable remaining in the race and dropped out.

### Francis McClusky

McClusky was interviewed by the Affiant on 10/22/19. He stated in summary that he was given Crews' name as someone that worked on petitions. After communicating with Crews by cellphone/text, he met with Crews around 15<sup>th</sup> and Chestnut. McClusky told Crews that he wanted 1000 signatures and told him he would pay \$2.50 a signature. Crews agreed and McClusky gave him a check for \$3,750.00, Citizens Bank check #237, dated 3/2/19 and the check was cashed on 3/4/19. McClusky said the agreement was made verbally, no written contract.

*Alonso*  
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McClusky stated that before the filing deadline he met with Crews and gave him the petitions that he had already completed. After the filing, one of McClusky's friends who was circulating for him contacted him and told him that there were names added to the petition he circulated and had notarized. He was viewing the page and there were more names on it than when he turned in, notarized.

After viewing the petition pages himself and hearing that he was not the only candidate with questionable petitions, he withdrew his name from the election process. He stated that he viewed other candidates' petitions that had used Crews. He said there were pages that were just copied and put in with a different page number.

### George Twardy

Twardy was interviewed by the Affiant and SA Liebttag on 05/24/21. In summary Twardy stated that he ran for election as a Municipal and Common Pleas Judge in Philadelphia, 2019. During the course of the election he enlisted the services of Crews / Mosely for the purpose of obtaining signatures on petition pages, he believed he paid for 1000 signatures. Any monies he paid would have been noted on his Campaign Finance report, he did not recall the dollar amount. Twardy stated that he did a review of all signatures on the petitions and any that he thought were challengeable he removed and did not submit.

### TD Bank records

On 06/09/2020 a search warrant was served on TD Bank for records relating the account of Rasheen Crews, Crews Consulting. In the return documents from TD Bank, the opening of a Business Account:

- A letter from the United States Department of Treasury to Crews Consulting Group LLC, Rasheen Crews Sole MBR, dated 11/15/2018. This letter provided Crews Consulting Group with their Employee Identification Number (EIN) of 47-XXXX394.
- Pennsylvania Department of State Corporation Bureau, Certificate of Organization Domestic Limited Liability Company in the name of Crews Consulting Group, LLC, entity #43163229, filed on 12/12/2014.
- Certification Regarding Beneficial Owners of legal Entity Customers – Legal Entity TIN listed is the same as Crews Consulting group LLC. The account opening is 12/16/2018 and the Certification of the Individual with Control is Rasheen Crews Sole member.

In the Crews Consulting Group LLC., Business Account the following checks were observed

*[Handwritten signature]* (AUM)  
*[Handwritten signature]*  
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Anthony Kyriakakis, \$1800.00, Pay to: Crews, Mosely & Assoc, 01/15/2019

Twardy for Judge Committee, \$1,000.00, Pay to: Crews Mosely & Assoc, 01/14/2019

Law Offices of Lawrence J. Bozzelli, \$1,000.00, Pay to Crews Mosely & Assoc, 02/12/2019

Twardy for Judge Committee, \$1,000.00, Pay to: Crews Mosely & Assoc, 02/13/2019

Henry Sias for Judge, \$500.00, Pay to: Crews consulting, 2/19/2019

Twardy for Judge Committee, \$1,000.00, Pay to: Crews Mosely & Assoc, 01/22/2019

Brian E. McLaughlin, \$2500.00, Pay to: Crews Consulting, 02/07/2019

Melissa Rubin, #1250.00, Pay to: Crews Consulting, 02/15/2019

Betsy Wahl for Judge, \$2250.00, Pay to: Crews Consulting, 02/19/2019

### R. H.

R. H. stated in summary that she has known Rasheen Crews since he was a child. She completed petition work for him in February/March 2019 time frame, she was being paid ten dollars an hour to circulate petitions. Once completed he would pick them up and pay her or someone would come and get them and pay her. When she did this some of the petitions were already partially completed.

On a Saturday she went to the area of Broad and Chestnut and met with Rasheen Crews. He took her to an office that had several tables and people she believed were notaries. She was told to just sign her name at the bottom of the petitions page "it was probably the section saying that I got all of the signatures. I have never signed that section before." R. H. said she participated for approximately three hours.

R.H. further described working for Rasheen Crews after he called her on the phone and instructed her to go to a hotel near the airport. At this location there were workers in a room signing petitions based on "street lists" that were present. R. H. stated that she did not sign any petitions that day, she was checking them and organizing the petitions and cleaning up. She reported that on one occasion, when done the work for the day, she took the petitions out to Crews who was waiting in a van with another male. On another day they were collected up and taken by a black female and another day by a male named Kevin.

### C. B.

C. B. stated that she was offered the chance to make some money working for a campaign. She reported to the 10<sup>th</sup> Floor of Broad and Chestnut Street where she met Rasheen Crews. He shook her hand and thanked her for coming. Crews explained that he needed help with paperwork. He had C. B. and "Lulu" sort the paper work out by candidate name and then he told them to turn the paper over and sign the back. C. B. was asked what would





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happen after she signed the petition papers as the circulator and she responded "We put them in the pile for someone to notarize and then they would be put in a pile and then Rasheen or an office worker would come and take the papers and bring us more to sign."

C. B. was asked who was in charge at the office you were doing this in and she replied "Rasheen Crews." When there was an issue they would go in the office, Rasheen and the other workers there and then when they would come out Rasheen Crews would say that this is what we are going to do.

### L. M.

L. M. stated in summary that she worked for Rasheen Crews on a few occasions. On this occasion she was contacted by a neighbor, Craig Thomas or Thompson, who told her he could get her some work. He had her report to a hotel around 15<sup>th</sup> and Market (Philadelphia), where they gave her a pile of papers and she signed blank petitions with information from a page they gave her. The pages had names typed on a paper and it had the names and addresses. L. M. would write the names and addresses on the petition paper. L. M. stated she signed names all night. After she signed a name, she would pass it down to the next person to sign. L. M. stated, "you did one line of the signature, printed name and address then passed it to the next person at the table. There were about eight people sitting at the table doing it."

L. M. stated that Crews was not present when she first arrived, but he was there approximately an hour later and stayed for the remainder of her time there that night, several hours. When asked if Rasheen Crews gave her any instructions that night, L. M. stated that Crews came in the room and introduced himself to her. He asked L. M. if she wanted anything to eat because he came in with food. He went in to a different room of the suite and he came out to where we were once or twice. At the end of the night, Crews paid Morrison \$60.00 for the work she had done. Crews invited her to come back and work more whenever she wanted.

L. M. stated that she worked for Crews again at the Land Title Building. She stated Crews brought a pile of papers and told her to fill out the section for circulator. After she signed the pages she then passed it to the Notary Public who stamped it.

### J. M.

During his brief interview, J. M. stated that he worked for Rasheen Crews giving out flyers and signing papers at a hotel. J. M. stated that he went to a hotel around 13-15th and Walnut and at that hotel he and approximately seven other people forged signatures for Rasheen onto some papers. He said this occurred in 2019 during election time. He said that he was given a sheet with names and addresses and he signed those to paperwork. He stated Crews told him to just pick the names from the sheet. He estimated that he was at the hotel for approximately two hours doing this and he believed he signed twenty names to the paperwork. Crews paid him \$50.00.

*[Handwritten Signature]*  
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### E. W.

E. W. stated that he did petition work in 2019, he was recruited by a neighbor, Craig who lives at 1222 S. 49<sup>th</sup> Street (indicated by pointing at the residence of Craig Thompson). E. W. stated that he was at a hotel downtown, whereat he would sign petition papers and he believes he was signing as the circulator. He was paid \$25.00 for doing this and he only did it the one time. He said he was at this hotel with people he did not know and Lu-Lu, who he identifies as L. M..

### A. B.

On 3/25/2021 at approximately 12:45PM, Affiant, along with agents Buck and Liebttag met with A. B. at the G.W. Hill County Prison. At approximately 12:53PM, Affiant advised A. B. her Miranda warnings, which she said she understood and agreed to speak with the agents. A. B. said that she met Rasheen Crews a few years prior when he came through the neighborhood asking people if they wanted to work. She worked for Crews doing petition work, getting people to sign petitions, and this was prior to 2018, although exactly when she could not say.

A. B. was asked to be more specific to the 2019 Primary Elections and she said that she first worked at the Petition parties where people were eating and drinking and signing each other's, candidates' petitions. She said that she was then told by Crews that she could have a choice to work in a hotel room or on the street. She said that she picked the hotel room. She said that she met with Crews on the 19<sup>th</sup> Floor in an office, downtown Philadelphia, where at he gave her the cash to rent a hotel room for people to work. She said that she rented a room at least twice, could not recall if it was consecutive or not, on Essington Avenue. She said that she didn't know specifically who or where, but she was aware that other people were also renting rooms for Crews to do the same thing.

A. B. said that at the room she rented on Essington Avenue there were other people that came to the room to work. A. B. said that Crews provided the materials they needed, the petition papers and a listings of names and addresses. A. B.'s job was not to sign the petitions, but to keep things organized, grouping the candidates in order and also to run to the store, Staples, to get supplies. The instructions by Crews to the people working, which she said he did in person at the room, were that they sign the petitions using the names and addresses he provided. He was clear that they could not use the same names for the same candidate that each name should only appear once per candidate. A. B. said that she believed Crews was paying them \$1.00 per signature. A. B. said that she was not a signer, only an organizer of the papers. All filled out petitions were turned over to Crews who was in and out of the hotel, she thought he had a driver with him.

On 04/09/2020 Affiant contacted The Microtel Inn and Suites By Wyndham, 8840 Tinicum Blvd, Philadelphia, PA 19153 looking for any rooms that may have been rented by A. B.. Microtel Inn and Suites provided Affiant with a copy of the receipt for a room, dated 03/09/2019, room #338, rented to A. B.. Attached to this receipt was a photo copy of A. B.'s Pennsylvania Driver's License.

### Examples of Qualified Elector Discrepancies

The name "Sadie Leak" appears seventeen times in the petitions of various candidates listed above. Affiant found that Saddle Leak has been a resident of resident of Providence Rehabilitation & Healthcare Center at





# POLICE CRIMINAL COMPLAINT

<b>Docket Number:</b>	<b>Date Filed:</b> / /	<b>OTN/LiveScan Number</b>	<b>Complaint/Incident Number</b> 41265
<b>Defendant Name:</b>	<b>First:</b> RASHEEN	<b>Middle:</b> EDGAR	<b>Last:</b> CREWS

Mercy Fitzgerald, Delaware County, PA., since 2012. Her name is Sadie Leak and Affiant has found it spelled on the petition pages as SADDIE, not Sadie.

"Nashala Buie" was found on various petition pages, eighteen times. Of those eighteen, fifteen times Sadie Leak's name was on the same pages.

On page 40, line # 14, candidate Vince Melchiorre for Common Pleas Judge Affiant observed that in the signature block it is signed "Nashala Buie" and in the printed name of elector it is printed "Nashala Leak" It then gives an address of 1101 S. Ruby Street which is an address that is repeatedly used for Sadie Leak.

Summer Woods, McLaughlin for Common Pleas, pages 18 and 2, both line 9. Woods stated she did not sign. Also pointed out that the name on the petition is spelled Summers, not Summer.

Beverly Sullivan, McLaughlin for Common Pleas, pages 3 and 22, both line 14. Sullivan stated she did not sign either page.

George Sheppard, Rubin for Common Pleas, pages 26 and 56, both line 17. The occupant of the address used on the petition stated that Sheppard does not live there for the last several years, he is homeless and living on the streets.

Craig Terrence, Rubin for Common Pleas, pages 26 and 56, both line 16. The occupant of the address used on the petition stated that the name is backwards, it should be Terrence Craig. Furthermore, Craig does not live there and did not live there in February, 2019.

James Rice, Wahl for Municipal Court, pages 59 and 60, both line 12. Current occupant stated Rice has not lived there since October, 2017.

Annie Rice, appears on a petition for Betsy Wahl for Municipal Court page 56, line 14 and also on James Berardinelli for Municipal Court, page 33, line 12. Rice stated she did not sign either.

Anita Davis, appears on a petition for Betsy Wahl for Municipal Court page 56, line 12 and also on James Berardinelli for Municipal Court, page 33, line 18. The home owner at the listed address on the petitions stated that Davis has not resided there since October, 2016.

*(Signature)*

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# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 41265
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## Handwriting Analysis by Detwiler

Khody Detwiler of Lesnevich and Detwiler, Forensic Document Examiners examined petitions submitted by or on behalf of the candidates listed in the above affidavit. Based upon the examinations and comparisons conducted to date, and being cognizant of the inherent limitations imposed as a result of examining subpar reproduction quality evidence in place of originals, Mr. Detwiler made the following observations and conclusions:

- The submitted Exhibit petitions contain a total of 2,596 elector signatures; however, it was determined that 1,194 of these signatures were duplicated (i.e., photocopied) and are therefore not naturally written genuine signatures of the purported electors. The petitions were produced by simply photocopying other Exhibit petition pages and changing the individual page numbers. On several of the duplicated pages, additional writings and/or corrections were observed and noted; however, the documents themselves (including the signatures and circulator information) were found to be identical reproductions of the same basic document(s). In other words, 32 of the submitted documents were determined to be reproductions of other Exhibit documents submitted for analysis.
- In addition to the above, I have determined there is a strong probability that multiple lines (or portions of multiple lines) appearing throughout the submitted Exhibit petition pages were not independently prepared, but rather completed by multiple groupings of common writers.
- Although not identical, numerous "like" names were found to be repeated throughout the submitted Exhibit documents. Replications of common "like" names were observed on petition pages for each individual candidate, as well as petition pages pertaining to multiple candidates. In some instances, the same name was found repeated multiple times on a single petition page. Additionally, groupings of common names were found in similar arrangements across multiple petition sheets for the same candidate, as well as multiple candidates.

Based on the foregoing, I request charges be approved against Rasheen Crews.

*J. Conner (Aum)*

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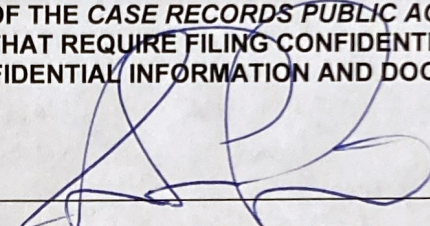


# POLICE CRIMINAL COMPLAINT

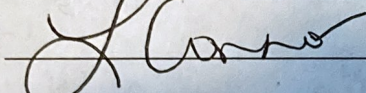
Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number 41265
Defendant Name:	First: RASHEEN	Middle: EDGAR	Last: CREWS

I, , 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 THAT NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

  
 \_\_\_\_\_  
 (Signature of Affiant)

Sworn to me and subscribed before me this 15 day of November 2022

\_\_\_\_\_ Date , Magisterial District Judge

My commission expires first Monday of ~~January~~ January, 2024

