

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF **CHESTER**

Magisterial District Number: **15-2-03**

MDJ Hon. **MARTIN G GOCH**

Address: **601 WESTTOWN ROAD
SUITE 110
WEST CHESTER, PA 19380**

Telephone: **610-436-5757**



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

VS.

DEFENDANT:

(NAME and ADDRESS)

JULIANNE

STACY

LEWIS

First Name

Middle Name

Last Name

Gen.

**520 COVENTRY LN
WEST CHESTER, PA 19382**

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number		Date Filed	OTN/LiveScan Number	Complaint/Incident Number P20336809	Request Lab Service? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 02/15/1989 First Name	POB MASSACHUSETTS Middle Name	Add'l. DOB 02/16/1989 Last Name	Co-Defendants? <input type="checkbox"/> Gen.	
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown					
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown					
HAIR COLOR <input type="checkbox"/> Gry (Gray) <input type="checkbox"/> Blk (Black) <input type="checkbox"/> Bln (Blonde / Strawberry)	<input type="checkbox"/> Red (Red/Aubn) <input type="checkbox"/> Ong (Orange)	<input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> WHI (White)	<input type="checkbox"/> BLU (Blue) <input type="checkbox"/> XXX (Ink./Bald)	<input type="checkbox"/> PLE (Purple) <input type="checkbox"/> GRN (Green)	<input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)
EYE COLOR <input type="checkbox"/> Blk (Black) <input type="checkbox"/> HAZ (Hazel)	<input checked="" type="checkbox"/> Blu (Blue) <input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)	
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO DNA Location					
FBI Number LCW8VAD5P	MNU Number			WEIGHT (lbs.) 250	
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
Fingerprint Classification					
	Ft. HEIGHT in. 5 09				

DEFENDANT VEHICLE INFORMATION

Plate #	State	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. Same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: _____

(The attorney for the Commonwealth may require the complaint, arrest warrant affidavit, or both, be approved by the attorney for the Commonwealth prior to filing. See PA. R. Crim. P 507.)

(Name of the attorney for the Commonwealth - Please Print or Type)

(Signature of the attorney for the Commonwealth)

(Date)

I, **DETECTIVE RUSSEL L. WEAVERLING III &
DETECTIVE GERALD V. DAVIS JR.**
(Name of the Affiant)
of **WESTTOWN EAST GOSHEN POLICE DEPARTMENT**
(Identify Department or Agency Represented and Political Subdivision)

**83/39991 &
02/25469**
PSP/MPOETC - Assigned Affiant ID Number & Badge #
PA0152700
(Police Agency ORI Number)

do hereby state:

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 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 [**255**] **WESTTOWN TOWNSHIP**
(Subdivision Code) (Place-Political Subdivision)
520 COVENTRY LA, COVENTRY VILLAGE, WEST CHESTER,

in **CHESTER** County [**15**] on or about **11/11/2020 to 11/23/2020**
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number P20336809
Defendant Name	First JULIANNE	Middle STACY	Last LEWIS

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. 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 §§ 213. - 213.7.)

<input checked="" 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 0					
<input checked="" type="checkbox"/> Lead?	1	2702	A9	of the	18	6	F1	1303	13A
Offense # Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code									
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description (Include the name of statute or ordinance): Aggravated Assault - Victim Less Than 13 and Defen									
Acts of the accused associated with this Offense: AGGRAVATED ASSAULT - VICTIM LESS THAN 13 AND DEFENDANT 18 OR OVER - 18 Pa.C.S. 2702 (a) (2)									

<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 0					
<input type="checkbox"/> Lead?	2	2901	A.13	of the	18	1	F1	1010	100
Offense # Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code									
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description (Include the name of statute or ordinance): Kidnapping of Minor - Inflict Bodily Injury									
Acts of the accused associated with this Offense: KIDNAPPING OF MINOR - INFLICT BODITLY INJURY OR TERRORIZE - 18 Pa.C.S. 2901 (a.1) (3)									

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older 0					
<input type="checkbox"/> Lead?	3	2901	A.13	of the	18	1	F1	1010	100
Offense # Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code									
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description (Include the name of statute or ordinance): Kidnapping of Minor - Inflict Bodily Injury									
Acts of the accused associated with this Offense: CONSPIRACY - KIDNAPPING OF MINOR - INFLICT BODITLY INJURY OR TERRORIZE - 18 Pa.C.S. 2901 (a.1) (3)									

<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 0					
<input type="checkbox"/> Lead?	4	2902	C1	of the	18	4	F2	1021	100
Offense # Section Subsection PA Statute (Title) Counts Grade NCIC Offense Code UCR/NIBRS Code									
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone			
Statute Description (Include the name of statute or ordinance): Unlawful Restraint of Minor/Parent - Risk of Bodil									
Acts of the accused associated with this Offense: UNLAWFUL RESTRAINT OF MINOR - BODILY INJURY/PARENT - 18 Pa.C.S. 2902 (c) (1)									



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number P20336809
Defendant Name	First JULIANNE	Middle STACY	Last LEWIS
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 0
<input type="checkbox"/> Lead?	5	2902	C1
Offense #	Section	Subsection	PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): Unlawful Restraint of Minor/Parent - Risk of Bodil			
Acts of the accused associated with this Offense: CONSPIRACY - UNLAWFUL RESTRAINT OF MINOR - BODILY INJURY/PARENT - 18 Pa.C.S. 2902 (c) (1)			

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 0
<input type="checkbox"/> Lead?	6	2903	C
Offense #	Section	Subsection	PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): False Imprisonment of Minor/Parent			
Acts of the accused associated with this Offense: FALSE IMPRISONMENT OF MINOR/PARENT - 18 Pa. C.S. 2903 (c)			

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 0
<input type="checkbox"/> Lead?	7	2903	C
Offense #	Section	Subsection	PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): False Imprisonment of Minor/Parent			
Acts of the accused associated with this Offense: CONSPIRACY - FALSE IMPRISONMENT OF MINOR/PARENT - 18 Pa. C.S. 2903 (c)			

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 0
<input type="checkbox"/> Lead?	8	2701	A1
Offense #	Section	Subsection	PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): Simple Assault			
Acts of the accused associated with this Offense: SIMPLE ASSAULT - 18 Pa. C.S. 2701 (a) (1)			



POLICE CRIMINAL COMPLAINT

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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 0
<input type="checkbox"/> Lead?	9	2701	A1
	Offense #	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): Simple Assault			
Acts of the accused associated with this Offense: CONSPIRACY - SIMPLE ASSAULT - 18 Pa. C.S. 2701 (a) (1)			

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 0
<input type="checkbox"/> Lead?	10	4304	A1
	Offense #	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): Endangering Welfare of Children - Parent/Guardian/			
Acts of the accused associated with this Offense: ENDANGERING WELFARE OF CHILDREN - 18 Pa.C.S. 4304 (a)			

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 0
<input type="checkbox"/> Lead?	11	4304	A1
	Offense #	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): Endangering Welfare of Children - Parent/Guardian/			
Acts of the accused associated with this Offense: CONSPIRACY - ENDANGERING WELFARE OF CHILDREN - 18 Pa.C.S. 4304 (a)			

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 0
<input type="checkbox"/> Lead?	12	2702	A9
	Offense #	Section	Subsection
			PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone <input type="checkbox"/> Work Zone	
Statute Description (Include the name of statute or ordinance): Aggravated Assault - Victim Less Than 13 and Defen			
Acts of the accused associated with this Offense: CONSPIRACY - AGGRAVATED ASSAULT - VICTIM LESS THAN 13 AND DEFENDANT 18 OR OVER - 18 Pa.C.S. 2702 (a) (2)			



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number P20336809
Defendant Name	First JULIANNE	Middle STACY	Last LEWIS
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 0			
<input type="checkbox"/> Lead?	13	2705	of the
Offense #	Section	Subsection	PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	
<input type="checkbox"/> Work Zone			
Statute Description (Include the name of statute or ordinance): RECKLESSLY ENDANGERING ANOTHER PERSON			
Acts of the accused associated with this Offense: RECKLESSLY ENDANGERING ANOTHER PERSON - 18 Pa. C.S. 2705			

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 0			
<input type="checkbox"/> Lead?	14	2705	of the
Offense #	Section	Subsection	PA Statute (Title)
			Counts
			Grade
			NCIC Offense Code
			UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	
<input type="checkbox"/> Work Zone			
Statute Description (Include the name of statute or ordinance): RECKLESSLY ENDANGERING ANOTHER PERSON			
Acts of the accused associated with this Offense: CONSPIRACY - RECKLESSLY ENDANGERING ANOTHER PERSON - 18 Pa. C.S. 2705			



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number P20336809
Defendant Name	First JULIANNE	Middle STACY	Last LEWIS

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of section 4904 of the Crimes Code (18 PA C.C. 4904) relating to unsworn falsification to authorities.
- This complaint is comprised of the preceding page(s) numbered 1 through 5.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

November 26th, 2020
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date _____ I certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed before a warrant can be issued.

15-2-03

(Magisterial District Court Number)

(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/LiveScan Number		Complaint/Incident Number P20336809
Defendant Name	First JULIANNE	Middle STACY	Last LEWIS	

AFFIDAVIT of PROBABLE CAUSE

AFFIANT BACKGROUND

Your Affiant is Detective Russell Weaverling of the Westtown-East Goshen Regional Police Department (WEGOPD). WEGOPD provides law enforcement services to the townships of Westtown, East Goshen, and Thornbury in Chester County, Pennsylvania. Det. Weaverling is a sworn investigator and law enforcement official empowered to conduct criminal investigations and make arrests for violations enumerated in the Pennsylvania Crimes Code (Title 18, Pennsylvania Consolidated Statutes as amended). Det. Weaverling has been a sworn law enforcement officer in the Commonwealth of Pennsylvania for nine years. Det. Weaverling has served with WEGOPD since 2011 and has been assigned to the Criminal Investigation Division since 2016. Det. Weaverling has a total of ten years of law enforcement experience, serving with the East Lansdowne Police Department from 2010 to 2015. Det. Weaverling has attended training in reference to Detective and New Criminal Investigator, Complex Case Investigation, Federal Bureau of Investigation Inter-County Detective School, Advanced Practical Homicide Investigation, Crime Scene Investigation, Managing the Property and Evidence Room, Federal Bureau of Investigation Criminal Investigative Division's Digital Image & Video Recovery Team (DIVRT), Pennsylvania State Police Class "A" Wiretapping and Electronic Surveillance, Crime Scene Processing, Search and Seizure, Vehicle Search and Seizure, Interview and Interrogation, Reid Technique of Investigative Interviewing and Advanced Interrogation, Investigative Techniques Using Social Networking Sites, Social Networking Law Enforcement Essentials, Vehicle Equipment, Enforcement of PA Vehicle Inspection Regulations, Fundamentals of On Scene Vehicle Collision Investigation, Supervisor Computer Based In-Service Training Program for the Alco-Sensor FST, DUI Detection and Standardized Field Sobriety Testing (SFST), Advanced Roadside Impaired Driving Enforcement (ARIDE), Substance Abuse Prevention for First Responders, Drug Field Testing Certification, Methamphetamine/Clandestine Drug Laboratory, Mexican Drug Cartels, Preparing Undercover Operations, Drug Investigations for Street Officers and New Investigators, JNET Application, and Officer Spanish Communication. Det. Weaverling a member of the United States Secret

I, **DETECTIVE RUSSELL L WEAVERLING (83)**, 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.


(Signature of Affiant)

Sworn to me and subscribed before me this _____ day of _____,
_____, Date _____, Magisterial District Judge

My commission expires first Monday of January, _____

SEAL



POLICE CRIMINAL COMPLAINT

Docket Number	Date Filed	OTN/LiveScan Number	Complaint/Incident Number P20336809
Defendant Name	First JULIANNE	Middle STACY	Last LEWIS

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Service's Electronic Crimes Task Force. Det. Weaverling has investigated or been involved in hundreds of investigations related to Driving Under the Influence, Theft, Receiving Stolen Property, Forgery, Fraud, Robbery, Burglary, Homicide, Rape, Arson, Sexual Assault, Assault, Weapons Offences, Prostitution, Possession of and Possession with the Intent to Distribute Narcotics, Computer Crimes, Criminal Conspiracy, Criminal Solicitation, and Criminal Attempt.

Your affiant, Detective Gerald Davis Jr., is a Chester County Detective assigned to the Chester County Detectives Office located at 201 West Market Street, West Chester Borough, Chester County, Pennsylvania. As a Chester County Detective your affiant is sworn in The County of Chester, Pennsylvania. Your affiant is empowered to conduct investigations and make arrests for violations enumerated in the Pennsylvania Crimes Code. (Title 18, Pennsylvania Consolidated Statutes as amended) Prior to being a sworn law enforcement officer with the Chester County Detectives, your affiant was a Pennsylvania Municipal Police Officer since 1998. (Approx. 18 years) In 1998 your affiant began a law enforcement career as a patrolman for the University of Pennsylvania Police Department in West Philadelphia for approximately 1 year. Your affiant was then hired by the Coatesville Police Department in 1998 as a patrolman. Your affiant was then hired by the Parkesburg Borough Police Department in February of 2000. In 2001 your affiant was assigned as the Lead Criminal Investigator for the Parkesburg Borough Police Department and held that position for approximately 9 years. During the time spent as a criminal investigator for the Parkesburg Police Department and the Chester County Detectives, your affiant conducted over 500 misdemeanor and felony criminal investigations as lead investigator and your affiant has assisted in over 500 criminal investigations in a support role to the lead investigator.

INVESTIGATION

On 11/23/2020 at 01:38:34 (hh:mm:ss) a female called 9-1-1 requesting an emergency response to 520 Coventry Lane in Westtown Township. The female caller, who later identified herself as Julianne Lewis, told the 9-1-1 Call Taker that her "boyfriend" was disciplining her nine (9) year old daughter, hereinafter the "victim child", and something went wrong. Lewis advised victim child was in the bathtub and was not breathing. Lewis said victim child's chest was only rising and falling when her "boyfriend was breathing into her chest," and he was "not doing the chest compressions." After asking her boyfriend, Lewis told the 9-1-1 Call Taker "we do not know how to do CPR." The 9-1-1 Call Taker instructed Lewis and her boyfriend, later identified as Dimitrios Moscharis, to remove victim child from the bathtub and place her on the floor, and provided them with CPR instructions. At about 01:42:32 (hh:mm:ss) Lewis left the bathroom to unlock the front door for responders, and left her phone with Moscharis. The CPR instruction lasted for about ninety (90) seconds, when Moscharis advised victim child's chest was rising and falling, showing signs of shallow breathing. The 9-1-1 call taker advised Moscharis to turn the victim child on her side, keep her head and neck as still as possible, to keep watching her breathing, and to say if anything changed. Moscharis tells the 9-1-1 Call Taker that the victim child wanted to take a shower and later discovered her in the shower with her clothes on, he tried to pull her out and wake her up but she wouldn't. At 01:45:17 (hh:mm:ss) Moscharis advised victim child's breathing was doing better, and tells Lewis, who had apparently returned, "Don't hold her head." At about 01:46:16 (hh:mm:ss) Moscharis yells, "Yeah come in" and "up here" to responders.

Officer Dittus was the first officers to arrive on scene and made entry into the residence through the front door which was closed, but unlocked. Ofc. Dittus and members of Good Fellowship Ambulance Company arrived just before Det. Ragni. Ofc. Dittus found the front door was unlocked and was greeted by Moscharis, who was calling to responders, "up here," from the top of the stairs leading to the second floor. Moscharis was standing just outside of the bathroom and told responders that victim



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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

child was in the bathroom. The victim child was found unresponsive on the bathroom floor with the bathroom door ajar, with her body obstructing responders' ability to make entry into the bathroom. EMS had to reach through the doorway and adjust the victim child's body to make entry into the bathroom. Responders found the victim child alone in bathroom, and found the bathroom floor and bathtub were wet. The victim child was fully clothed but her clothing and body were both wet. The bathroom was too small for EMS to administer care to victim child, so she was moved to the hallway. The victim was unable to maintain her breathing on her own and was transported to Nemours/A.I. DuPont Hospital ("DuPont") for treatment. Lewis accompanied the victim child to DuPont.

While in the residence Officer Dittus noticed a curtain rod and packaging tub in the second floor hallway, outside of the bathroom. When EMS was removing clothing from the victim child's body while providing lifesaving care, Officer Dittus noticed bruising on the victim child's body. The bruising appeared both old and new, showing redness, swelling, and discoloration of the skin on the victim child, between the victim's chest and waist.

Detective Ragni noticed the bathtub was wet when they arrived and there was clothing on the ground that appeared to belong to the nine (9) year old victim.

Ofc. Hagan spoke with Lewis who identified herself as the victim child's mom. She advised Moscharis was not the victim child's father but had been watching her overnight recently and "he's been helping discipline her, but he took it way too far." When asked what she meant by taking it way to far, Lewis replied, "you see the bruises on her?" Lewis admits the bruises were there when she last saw victim child, and admitted they were from the night before (11/21/2020). When asked about what happened before calling 9-1-1, Lewis said victim Moscharis was watching the victim child, who was sleeping, while she was working. Moscharis told her the victim child was not breathing. Lewis admitted to seeing Moscharis spank victim child in the past, which she said she did not like, but accepted it because it was "what was supposed to be done. Fine. She's lying." Lewis claimed to have only been home for an hour on 11/22/2020.

Det. Ragni spoke with Lewis who stated she was at work when she received a call from Moscharis advising the victim child was not breathing, so she returned home. Lewis identified Moscharis as her boyfriend and advised that Moscharis is not the victim's child's father. Lewis described Moscharis to have a "step-father" type relationship with the victim child. Lewis said she was not good with disciplining her daughter and allowed for Moscharis to handle disciplining the victim child. Lewis advised the last time she saw the victim child was earlier in the night (11/22/2020) when victim child was walking up and down the stairs, and victim child had bruises on her. Lewis advised she never checked the extent of victim child's bruises. Det. Ragni asked about blood on the walls along the staircase. Lewis said the blood was from victim child's nails, which was Lewis's way of punishing victim child because she doesn't like "touching" victim child. Lewis handed Det. Ragni a mobile (cell) phone, which Lewis identified as Moscharis's mobile (cell) phone. The phone was an Apple iPhone Pro Max.

Detective Ragni spoke with Moscharis while EMS was caring for the victim. Moscharis advised he was Lewis's boyfriend but was not the father of the victim child. Moscharis said he was watching the victim child while Lewis was working. At that time, Moscharis reported the victim child started having a panic attack so he told her to take a shower and he later found the victim child unresponsive on the bathroom floor. Moscharis reported that he picked her up, put her in the bathtub, and splashed water on her in an attempt to wake her up. Moscharis reported that he then removed her from the bathtub and placed her on the floor to perform CPR. Moscharis agreed to accompany police to WEGOPD for an interview in regards to what occurred.

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Detective Ragni, Detective Meiswich, and Chester County Detective Davis interviewed Moscharis inside the Westtown-East Goshen Police Department and the interview was recorded. Moscharis admitted to disciplining the victim physically in the past, but when going over the events that occurred the night of 11/22/2020 into 11/23/2020, he denied any physical discipline. Moscharis's account of events was inconsistent throughout and with his prior statements. Moscharis mentioned that earlier in the day (11/22/2020) the victim child was not listening and he had to discipline her, although he denied physical discipline. He reported having her walk up and down the stairs and hold her arms out to her sides for extended periods of time. He also reported that he locked her in the second floor linen closet. Moscharis also admitted to using his laptop computer in the past to conduct internet searches on disciplining children but Moscharis denied physically disciplining the victim child on the day she was taken to the hospital. Moscharis did admit that on Saturday, 11/21/2020, he struck the victim child several times, using approximately 60% of his strength. He claimed that he did not see the bruises to the victim child's body, mentioning that he saw her naked prior to her taking a bath on Saturday night (11/21/2020). Moscharis reported that later in the night on Sunday, 11/22/2020, he told the victim child to go to bed, but she refused, advising she had school work to do. Moscharis lost his patience and began yelling at the victim child to go to bed and he said that the victim child began to have a panic attack. The victim child went to the bathroom and an unknown period of time passed until Moscharis eventually went to check on the victim child and found her unconscious on the bathroom floor. Moscharis told investigators that he knew the child was not breathing for at least 10-15 minutes prior to Lewis returning home but did not call 9-1-1 to get assistance for the child.

At about 0915 hours Moscharis was advised he was no longer free to leave and was under arrest for Aggravated Assault related to the incident. Moscharis was advised of his Miranda Warnings and agreed to keep speaking with police.

At approximately 1211 hours, Moscharis told Detective Ragni he had additional information to provide. Moscharis was again advised of his Miranda Warnings and agreed to provide an additional recorded interview to Detective Ragni. Moscharis again denied physically disciplining the victim child on Sunday, 11/22/2020, but admitted that he had disciplined the child in "five sessions" on Saturday, 11/21/2020, throughout the day. Moscharis reported that he used a rod from a set of blinds to beat the child all over her body and that Lewis was present while these beatings occurred. Moscharis reported that he had been disciplining the child more and more as her behavior grew harder to control and that Saturday, 11/21/20, was the worst he had ever beaten her. Moscharis reported that on Sunday, 11/22/20, he only disciplined her by making her walk up and down the stairs, making her stand with her arms outstretched, and locking her in the closet.

WEGOPD Det/Sgt. Bretz and Chester County Detective Davis responded to DuPont to assess victim child's condition and interview Lewis. Detective Sergeant Bretz was advised the victim child had an injury to her forehead and that she was hypoxic with agonal breathing. Agonal breathing is a term used to describe the gasping a person does when they're struggling to breath because of cardiac arrest or another serious medical emergency. Dr. Nicole Green informed investigators that the victim suffered a "near fatality," meaning that the child was in critical condition and had suffered life-threatening injuries. The victim child also had injuries to her lungs, consistent with trauma, and hemorrhaging on her left eye. Doctors advised that it was likely that the victim had suffered brain damage due to oxygen deprivation for an extended period of time. Dr. Stephanie Deutsch, a board-certified child abuse pediatrician at DuPont Hospital, certified the victim child's condition as a "near fatality" and reported to Childline that the victim child was unlikely to survive her injuries. Dr. Deutsch reported that the victim child had extensive bruising throughout her body and that the bruises were patterned and appeared striped in places, consistent with the implements described.



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Det/Sgt. Bretz and Det. Davis spoke with Lewis on two different occasions, while at DuPont Hospital, once at about 0553 hours and again at 1601 hours. During the interviews Lewis provided additional information about the victim child. Lewis reported that she moved to 520 Coventry Lane, in Westtown Township, two (2) months ago and has been dating Moscharis for about two (2) months. After Moscharis saw the difficulty Lewis was having with controlling her daughter, Lewis reported that Moscharis told her that the victim child needed more discipline. When the victim child would act out or not listen Moscharis would "discipline" her physically; the "discipline" included hitting the victim with objects, such as the long thin plastic rod used to rotate window curtains or a shower curtain rod. Lewis indicated that if she felt the discipline became excessive she would have told Moscharis to stop. Lewis also mentioned that victim child is currently enrolled in school at Lombardi Elementary School in Wilmington, Delaware, and attends classes remotely/virtually and has an Apple iPad that she uses for her school work and taking notes. Lewis provided Det/Sgt. Bretz and Detective Davis with her Apple iPhone XS, which she advised the phone number for was 215-817-5373, and gave investigators written consent to seize and search the contents of her iPhone.

Lewis reported that on 11/22/2020 at about 2100 hours she left the victim child in Moscharis's care so she could go to work. At 0049 hours Lewis received a text message from Moscharis telling her to come home. Lewis called Moscharis to see what the issue was and Moscharis said that the victim child was not breathing and she needed to come home. Lewis arrived home about 45 minutes later and found the contents of the residence in disarray, showing signs of a struggle or altercation. Lewis reported that she then found her daughter unresponsive in the bathtub with Moscharis over top of her performing mouth-to-mouth rescue breaths. Moscharis told Lewis that a shelf might have fallen on the victim's head. Lewis called 9-1-1 and, while waiting for responders to arrive, Moscharis told Lewis to lie and tell police the victim child's father injured the victim child. Lewis also mentioned that Moscharis has an additional cell phone, belonging to his mother, on the kitchen counter and the phone contains videos of their sex and marijuana use.

Police later compared the recordings of all of Lewis's statement made during the investigation, including her call to 9-1-1, conversation with Ofc. Hagan, conversation with Det. Ragni, and the two separate interviews with Det/Sgt. Bretz and Detective Davis at DuPont Hospital. Investigators found several inconsistencies in her statements. During the 9-1-1 call Lewis said victim child was not breathing. When she first spoke with Det/Sgt. Bretz and Detective Davis at DuPont Hospital she denied saying victim child was "not breathing" when she called 9-1-1, and claimed she said victim child was "not responding." When Lewis spoke with Ofc. Hagan at her residence, she mentioned seeing bruises on victim child's butt and back, but during Lewis's first interview at DuPont Hospital she told investigators she of only aware of one bruise on victim child's arm. During the same first interview with Lewis at Dupont Hospital, she admitted Moscharis was physically disciplining victim child and denied being home when the physical discipline was occurring, but during the second interview Lewis admitted to being present for one occasion when Moscharis was forcefully disciplining the victim child. During the first Dupont Hospital interview Lewis admitted that Moscharis and she had placed victim child in the closet as a "time out" punishment for misbehaving, but during the second DuPont Hospital interview Lewis admitted that she was home when victim child was placed in the second floor linen closet from about 1600 hours to 2100 hours before she left for work on 11/22/2020 and that the victim child was still in the closet when she left for work.

Prior to interviewing Moscharis, investigators secured his cell phone to prevent him from using it during the interview. At some point during the interview, investigators learned that Moscharis was using his Apple watch (smartwatch) to text Lewis at 0445 hours "IM sorry IM tellin tlen it was all me". Lewis responded, "I am because it was,



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I admitted to my part too".

On 11/25/2020 at about 1001 hours Det. Weaverling, with the assistance of Chester County Detectives, obtain and served a search warrant on Lewis's iPhone XS.

At about 2001 hours Det/Sgt. Bretz, Detective Ragni, and Detective Davis made contact with Lewis at 520 Coventry Lane. Lewis was asked to come to WEGOPD for a follow up interview. Lewis agreed to meet investigators at WEGOPD, drove herself to the police station, and accompanied Detective Davis and Detective Ragni to the Interview Room, where the conversation was recorded. At about 2012 hours Lewis was read her Miranda Warnings and agreed to speak with investigators.

During the interview Lewis admitted to watching Moscharis forcefully beat the victim child on six separate occasions, between the dates of 11/11/2020 and 11/22/2020, inside her residence at 520 Coventry Lane.

Lewis admitted she witnessed three separate forceful beatings of child victim on approximately 11/11/2020, 11/13/2020, and 11/20/2020. The first beating she observed Moscharis beat the victim child with a clothes hanger six (6) to eight (8) times on her shoulder, butt, and back. Lewis also watched Moscharis forcefully grab victim child by her shoulders, pin her against the wall, and cover her mouth with his hand, while verbally berating victim child.

The second assault Lewis described was on or about 11/13/2020. Lewis said Moscharis made the victim child kneel on a pile of plastic clothes hangers for twenty (20) minutes, and spanked victim child on her butt with an open hand.

The third assault described by Lewis was on or about 11/20/2020. Where Lewis watched Moscharis forcefully strike victim child seven (7) to nine (9) times on her butt and lower back with a "plastic rod".

During the assaults between 11/11/2020 and 11/20/2020, Lewis told investigators that victim child was made to walk up and down stairs for hours at a time, and that Moscharis began placing victim child in a closet for 15 to 45 minutes as part of her punishments. Victim child was also made to sleep in the unfurnished basement, on the concrete floor, on at least three (3) separate occasions.

Lewis described that on 11/21/2020 she watched Moscharis beat the victim child on three (3) separate occasions. The first "session", Moscharis used his hands to forcefully strike the victim child on her their butt, back and arms. Lewis described the second "session" as Moscharis using a clothes hangar to beat the victim child on her butt and lower back. The third and final "session, Lewis watched as Moscharis pulled the victim child's pants down and forcefully beat her on her lower bare butt and back. Lewis admitted

Lewis admitted that from 11/11//2020 to 11/21/2020 she saw progressive injuries after each assault and took no action to protect victim child or provide care for her injuries.

Lewis advised that on 11/22/2020 at about 0530 hours she arrived home from driving for Lyft. At this time victim child was in the second floor linen closet with the door shut. At about 0645 hours Lewis left the victim child in Moscharis's care and the victim child was still in the linen closet with the door shut. At about 1630 hours Lewis returned home to find Moscharis was still home and the victim child was still in the linen closet with the door shut. Sometime after arriving home, Moscharis and she left the residence, with victim child still in the linen closet, to go purchase marijuana. When Moscharis and she returned home the victim child was still in the closet with the door shut. Lewis and Moscharis got high and fell asleep with the

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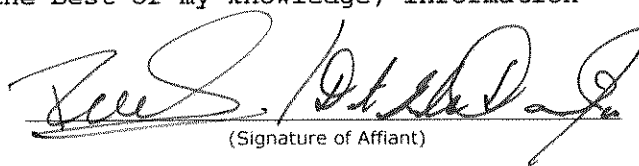
victim child still in the closet with the door shut. Lewis stated at about 2115 hours she left for her shift with Lyft and the victim child was still in the closet with the door shut. Based on Lewis's statement, it is believed that the victim child was forced to remain in a two (2) foot by three (3) foot linen closet, with cloths dumped on top of her, and the door shut, in excess of fifteen (15) hours. During that time, the victim child had no food or water and was not allowed to use the bathroom. Lewis claimed to have spoken to the child through the closet door during the day on 11/22/2020, but made no effort to release her or render aid to the victim child for her injuries.

The victim child remains in critical condition at Nemours/A.I. DuPont Hospital for children, mechanically ventilated and without any spontaneous movement. Dr. Deutsch reported that victim child's neurological exam showed evidence of hypoxic ischemic encephalopathy (brain damage from lack of oxygen to the brain) and that this injury is consistent with a strangulation or suffocation event that caused her brain to be deprived of oxygen. The victim child also had notable injury to the ligaments along her spinal cord, consistent with a significant "hyperflexion" mechanism. Dr. Deutsch noted that this injury is consistent with the victim child's imprisonment in a small space and the inappropriate placement/contortion of her body during the assault and/or after the loss of consciousness.

CONCLUSION

Your affiants believe the above facts and circumstances show that there is probable cause to charge the defendant, Julianne Lewis, with six (6) counts of Aggravated Assault, 18 Pa.C.S.A. 2702(a)(9); Kidnapping, 18 Pa.C.S.A. 2901(a.1)(3); Endangering the Welfare of Children, 18 Pa.C.S.A. 4304(a)(1); four (4) counts of Unlawful Restraint, 18 Pa.C.S.A. 2902(c)(1); four (4) counts of False Imprisonment, 18 Pa.C.S.A. 2903(c); six (6) counts of Simple Assault, 18 Pa.C.S.A. 2701(a)(1); and six (6) counts of Recklessly Endangering Another Person, 18 Pa.C.S.A. 2705 and with Conspiracy to commit these offenses.

Your affiants being duly sworn according to law, depose and say that the facts set forth in the affidavit are true and correct to the best of my knowledge, information and belief.


(Signature of Affiant)