

Independent Review of CR-232-2017 (Matthew Steven Starr Case)

The way the Matthew Starr case was presented on local and social media was not very accurate. I'd be a liar if I didn't acknowledge that I had a role in that. I had a role in what eventually lead to Starr's kids being bullied and harassed at school. I'm certainly not proud of this. So this is where I am going to attempt to make things right. If you are familiar with criminal complaints prepared by Corporal Matthew Bonin, PSP, this one was no surprise. If not, there's plenty to learn and I will teach you.

The 33 page criminal complaint against Matthew Starr is a travesty to all current and former law enforcement and I will expose that here. I will pick this criminal complaint apart, page by page. I'm not suggesting Matthew Starr is a saint but come on, we're all human. What I am suggesting is that Matt probably had a gambling/drinking problem and his 'team' let him down. When I was in the service, if someone was having an issue, everybody helped them tackle it. You helped your buddies through whatever. If they needed help, you made sure they got it. You and everyone else supported them along the way. You didn't ignore it for five years and then throw the person to the wolves when it become convenient. That demonstrates a lack of leadership and culture at the Altoona Police Department. For that I blame Janice Freehling. She's no leader. As far as the rest of you that turned a blind eye, and then tried to throw Starr under the bus according to whatever you perceived was going on the past five years, shame on all of you. Interesting that none of you had any interest in confronting him in person, yet you had no issue smearing him to hell and back to keep PSP busy and ignorant of all the other illegal things going on at the wonderful Altoona Police Department.

You can read the original criminal complaint in it's entirety here:

[Criminal Complaint Matthew Steven Starr](#)

As Mike Ference likes to say, read and judge for yourself. I'll be going screen shot to screen shot. Nothing here has been taken out of context. In fact, I encourage you to read the entire criminal complaint first and then come back and check out all the red flags as I highlight them. I will only address the narrative/affidavit. Here. We. Go.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number:	Complaint/Incident Number PA17-183043
Defendant Name:	First: Matthew	Middle: Stephen	Last: STARR

AFFIDAVIT of PROBABLE CAUSE

I, your affiant, Cpl. Matthew J. BONIN, Troop G, Hollidaysburg, Criminal Investigations Unit Supervisor, have been employed by the PSP for 10+ years. I have been involved in numerous criminal investigations during my career and have received hundreds of hours of training in various types of criminal investigations. Tpr. Craig A. GRASSMYER, co-affiant, has been employed by the PSP for 24+ years, has also been involved in numerous criminal investigations during his career and has received hundreds of hours of training in various types of criminal investigations.

This criminal complaint was prepared by Cpl. Matthew J. BONIN.

On 02/21/17, Janice FREEHLING, Chief of Police of the Altoona, PA Police Department, formally requested that the Pennsylvania State Police initiate an investigation into Sergeant Matthew S. STARR, WHO IS THE DEFENDANT, of the Altoona Police Department. FREEHLING advised that it came to the attention of the APD that the Altoona Roman Catholic Credit Union, known as ARC Federal Credit Union, reported to the Altoona City Solicitors, Larry CLAPPER and Attorney Dan STANTS, that Sergeant Matthew STARR presented 3 checks to the credit union. The ARC is located at 1919 7th Ave. Altoona, Pa 16602. Two of the checks were from the St. STANISLAUS KOSTKA BROTHERHOOD, located in Altoona, Pa. The two checks from St. Stans were made out to the Altoona Police Department; Matthew STARR. The first check was in the amount of \$2000 even and the second check was in the amount of \$500 even. A third check was cashed by Sergeant Matthew STARR for \$500 from Thompson Pharmacy, also located within Blair County. The check from Thompson Pharmacy was made out to the Altoona Police Department with Matt STARR in the memo. A copy of the Thompson Pharmacy check was obtained from Thompson Pharmacy Controller Robert Edward TYLER. This check was obtained by Trooper Craig GRASSMYER on 03/01/17, at 1538 HRS. Upon viewing the check, I observed that it was endorsed by Matt STARR.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

The back of the check was stamped "For Deposit Only, ARC FCU" and was dated 01/20/17 as the deposit date. Chief Janice FREEHLING was unaware of these checks. As per Chief FREEHLING, the checks should have been deposited into an account belonging to the City of Altoona and further advised that this is not standard operating procedure for an Officer to be handling checks as STARR did. It was later determined that STARR requested money from these businesses for the purchase of equipment to investigate fires.

The aforementioned information about the questionable checks was provided to PSP, from Chief FREEHLING, through a formal letter requesting an investigation. PSP Hollidaysburg initiated this investigation on 02/22/17.

On 03/01/17, at 1440 HRS, Trooper Craig GRASSMYER interviewed Chief FREEHLING in the presence of Lt. Anthony ALIANIELLO, at the Altoona Police Department. Chief FREEHLING then related that a Facebook posting was found on the personal Facebook page of Sergeant Matthew STARR. The post was for a Firearms Training System (FATS System). The specific model of the FATS is a Beamhit 390. STARR'S personal Facebook page can be found using the hyperlink: <https://www.facebook.com/matthew.starr.37> On 03/06/17, I, Cpl. Matthew BONIN, viewed this page and observed this post on his Facebook page, which is open to the public to view. The post was made on 09/14/16. Chief FREEHLING advised that the Altoona Police Department had paid for a Firearms Training System with funds from the Community Development Block Grant program for approximately \$8,000. This purchase was made in approximately June of 2015. Chief FREEHLING advised that the FATS system is unaccounted for. Chief FREEHLING further advised that she interviewed 4 officers under Sergeant STARR'S command and none of the officers had ever seen the FATS system.

Next, Chief FREEHLING advised that STARR also attempted to get fire equipment through a donation from Scott Electric. This donation was attempted to be completed through Jessica DiGENNARO who is the president of a local non-profit in Altoona, PA called, "Because We Care Altoona." Chief FREEHLING provided Trooper GRASSMYER nine (9) pages of screen shots from a cellular phone of Jessica DiGENNARO. Trooper Grassmyer and Cpl. Matthew Bonin read the screen shots.

Cpl. Matthew Bonin and Tpr. Grassmyer interviewed Jessica DiGENNARO on 04/27/17 at PSP Hollidaysburg. DiGENNARO related the following information. STARR approached her in October of 2016 and advised that the police department is in need of equipment to investigate fires. STARR told DiGENNARO that if the money goes to a non-profit, all the money can be used to purchase equipment for fire investigations. If it goes into the police department general fund, the money would be split up between city departments. DiGENNARO understood this to be other departments within the city such as the fire department and not just the police department.

So after we get over CPL Bonin's self gloating about being PSP for 10 years and this not being his first investigation, we can start to dissect this faulty narrative. Hard to believe he would actually put those kind of credentials out there and then write a piece of garbage like this. It's also interesting to note that, Trooper Craig Grassmyer, of whom I have no issue and believe was an honorable police officer, doing his job to the best of his ability, promptly retired in the summer of 2017. What a well timed coincidence.

The first red flag is that Janice Freehling requests an outside agency to investigate one of her officers. You may recall that after the Pellegrine's wedding fight incident in 2010, Freehling took every measure possible to impede the PSP investigation that followed. I was advised by a former Logan Township Police Officer that SOP was to have Logan back up APD for a fight at Pellie's call. This was always the drill, except on the night of the fight involving off duty APD Officers. It appears the 'cover up' allegedly began before the 911 call was even made. A former APD Officer then alleged that Freehling enlisted Sergeant Ben Jones and Corporal Ashley Day to intimidate coworkers and tell them 'not to talk to PSP'. This appears to be the reason why the investigation took so long and why PSP keep hitting roadblocks along the way. You'll find the same cover up tactics with the Freiwald incident, Kelleher's accident, Stirk's DUI, and several others. So what was the motivation to throw Starr under the bus so quickly?

Then there's the issue of the Firearms Training Sims (FATS) systems. I was an active administrator on the Altoona and Surrounding Area Corruption page during the time period this information was first disseminated to the page in late February of 2017. A screen shot of this post in question was sent to the page. While I no longer have the original screen shot, I took one of my own the last week of February 2017. The original was a photograph of a computer screen and was not very clear to read. When the image was originally forwarded to us, it came with instructions that 'this needs to be posted so that PSP can investigate it'. The only reason I can see for posting such a screen shot is that it was private. Meaning it could only be viewed by friends of Matthew Starr and NOT open to the public as the criminal complaint suggests. By posting the image to a Facebook Page it became a matter of public record. A few days later the page was asked to remove the image because it allegedly 'couldn't be proven'. Did someone then access/hack Matthew Starr's Facebook account and change the privacy settings on this post? Who would have motive to do such a thing? If this is the case then this 'evidence' was illegally obtained and shouldn't even be admissible. As for the checks it certainly seems like a defense that Starr cashed the checks to his own bank account to keep the funds under his control. This way he could use it to buy whatever equipment he needed for fire investigations. Starr was the arson investigator at APD for some time. Where is the part of the criminal complaint that examines what all equipment Starr did or didn't purchase for the city? Can anyone else find it? I couldn't.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

October of 2016 was also the time period that STARR requested donations for the purchase of equipment to investigate fires from St. Stanislaus Kosta Brotherhood and Thompson Pharmacy.

Next, Matthew S. STARR had requested DIGENARRO to cash a \$2000.36 check from Scott Electric. She advised that STARR obtained the check directly from Scott Electric. She indicated that Scott Electric has a policy in place where they can only provide donations through non-profit organizations. STARR gave the check to the Central Pennsylvania Community Foundation. She advised that it was deposited on February 17th, of 2017. She advised that STARR then requested the Central Pennsylvania Community Foundation to write a check out directly to him for the \$2000.36. DIGENARRO advised that this raised red flags with her because of the fact that he wanted the check written out directly to him. Additionally, she advised that the foundation has a policy in place where they need board approval and two signatures for any transaction over \$500. She advised that when she told STARR this, he then told her that Scott Electric asked that four separate checks be written out for \$500. Some of these conversations between STARR and DIGENARRO were done via text message. DIGENARRO preserved some of these conversations via a screen shot. These text message conversations were from January and February of 2017. DIGENARRO related that it was apparent STARR really wanted the check written out to him and she told him that there was no way they would write the check out directly to him. Based on everything that was going on, DIGENARRO thought the whole transaction was suspicious and she subsequently contacted Chief Janice FREEHLING and informed her of the situation. DIGENARRO advised that they still have the \$2000.36 check in their account and it was never given to Matt STARR.

Casino records at the Rocky Gap Casino were later obtained – through a court order - which showed that in January of 2017, STARR wagered \$2755 at Rocky Gap Casino and in February of 2017, STARR wagered \$25,623 at Rocky Gap Casino. In fact, on January 30th of 2017, STARR is sending DIGENARRO text messages asking for updates on the \$2000.36 check and on that same day, he wagers \$2355 at the casino.

So Starr is soliciting funds for the department from two places that he frequents and where he is well known? As far as the \$2000.36 check, if Starr wagers \$25K+ in February what good is two grand going to do him to be checking desperately for updates as this complaint suggests? He *never* gets the check. At this point I would expect to see more mentions of Starr's bank account statements from this time. Where did the \$25K come from? Once again, what you will never see in this complaint is whether or not Starr ever delivered on or purchased any equipment for the department. Throwing in the text messages about casino bets and requested updates on money for equipment is circumstantial at best. Why would Starr make the \$2355 bet before he had the funds in hand if gambling was his intention for the funds?

Because these 'wagers' are very misleading. If I sit down at a blackjack table and buy in with \$300 dollars, roughly 60 hands are dealt an hour. If I get \$10 each hand, at the end of that hour it's actually \$600 that I am now wagering. If I continue to play for three hours I am already at \$1,800. Also keep in mind this does not include double downs, splits, etc. So while CPL Bonin would make it appear that I spent the \$1,800, the amount I paid out of pocket is still only \$300. I could walk away with a net gain and CPL Bonin's interpretation would show me having a net loss. CPL Bonin can't draw the conclusions that he is because it's impossible to tell from the lack of available information. CPL Bonin's fundamental misunderstanding of how to interpret the statistics in front of him casts an obvious shadow of doubt over the entire case. Since so much of this case seems centered around casinos and gambling why didn't PSP Gaming handle this investigation?

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 03/02/2017, at 1550 HRS, Tpr. Grassmyer went to Scott Electric, Duncansville, PA. Tpr. GRASSMYER spoke with Clair Gilbert LAUVER, Scott Electric Manager and LAUVER related, "Yes I do know Matt STARR. I've been a friend of his for a long time. I received a request from Matt last summer (summer of 2016). Matt wanted equipment for his position of fire Investigator in Altoona, PA. We make contributions to local non-profit agencies. I filled the order that he requested. It came to \$2000.36. We sent a check in that amount to the Central Pennsylvania Community Foundation. Matt never did pick up the equipment. It is still sitting back in the warehouse.

On 05/03/17, I, Cpl. Matthew BONIN, re-interviewed Clair LAUVER at PSP Hollidaysburg. I showed him the message which Sgt. Matthew STARR sent to Jessica DIGENARRO in which STARR says that Scott Electric wants 4 payments of \$500. LAUVER advised that he never said that nor would Scott Electric want to conduct a transaction like that. I asked him to clarify why the money would need to go back to Scott Electric from the CPCF. He advised that STARR provided him with a list of the equipment he wanted to investigate fires. The equipment came to just over \$2,000. He told STARR the equipment would have to be purchased by a nonprofit. He advised that Scott Electric sent the check to the CPCF through Matt STARR. LAUVER advised that technically speaking, the nonprofit could use that money to purchase whatever they deemed necessary and from whoever they wanted. LAUVER advised that they could use Scott Electric's \$2000 to purchase the same equipment from another electrical company if they wanted. However, since STARR had already told LAUVER that he wanted to purchase the equipment through Scott Electric, he assumed that the CPCF would just pay Scott Electric for the equipment from the \$2000.36 that Scott Electric already gave them. Like DIGENARRO, LAUVER advised that no checks should have been issued to Matt STARR.

The first red flag is that CPL Bonin 're-interviews' Clair Lauer. Why? CPL Bonin is attempting to solicit a certain response during the interview. Now it's a case of he said she said. Not fact. So here we have this criminal complaint smearing Starr as if he didn't pick up the equipment because he wasn't interested in it. Was he suspended before the equipment came in? No checks were actually issued to Starr. Why is that last line in the first paragraph even included? It should also be noted that Jessica DiGenarro is a personal friend of Janice Freehling. If someone that had influence over Freehling was given the word to throw Starr to the wolves, DiGenarro would have no reason not to be on board 110%. Did Clair Lauer actually have proof that this alleged message sent by Matthew Starr was actually sent by Matthew Starr or did he just take CPL Bonin's word for it and then exhibit the response and statement that CPL Bonin wanted?

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

In regards to the Firearms Training System, I, Cpl. BONIN, asked Chief FREEHLING how the purchase would have been made by the City of Altoona. Chief FREEHLING advised that Sgt. STARR would have been required to submit a purchase requisition form to Mary JOHNSON, the director of the Community Development Block Grant Program, located in Altoona, PA, from which the grant money came to pay for the Beamhit 390 Firearms Training System. I, Cpl. BONIN, interviewed Mary JOHNSON on 04/17/17 at 1545 HRS, via telephone. I asked her to clarify how STARR approached her about purchasing the Beamhit 390 Firearms Training System for the Altoona Police Department. She advised that Sgt. STARR informed her that the Firearms Training System purchase would have to be brokered / purchased through a Firearms Dealer. Mary JOHNSON advised that she needed 3 quotes from 3 dealers. Sgt. STARR provided her with the 3 quotes. The quote from Outdoor City Guns in Altoona, PA, was the lowest quote. The CDBG subsequently approved the purchase and Altoona City sent a check to Outdoor City guns in the amount of \$7654.00. The check was written from an account for the CDBG program. The other quotes were from Fair Warning Systems, MILO, and SES. STARR provided a quote of \$14,000 for the "Fair Warning Systems" Firearms Training System. The actual quote was for \$12,500. Representatives from the other two companies were unable to provide me with any documentation on quotes they provided to Matt STARR. Later in the investigation, I discovered that STARR actually purchased this system for \$1,290.00.

There were two serial numbers listed for the Beamhit 390 units that STARR purchased from L-3 Communications; however, there was no serial number listed on the invoice that STARR provided to the City of Altoona. The serial numbers listed on the invoice from L-3 Communications were: 13086001 & 13086002. Once received, the Altoona Police Department would have issued a tag number in order to inventory the recently purchased firearms training system. This would have been a green tag # with the number "1611" assigned to the Beamhit 390 system. This tag would have come directly from Mary JOHNSON of the CDBG program. During interviews with members of the Altoona Police Department, myself and Trooper GRASSMYER confirmed that no verification was made that the Beamhit 390 system was accounted for and in the possession of the Altoona Police Department. Furthermore, in a conversation I had with Mary JOHNSON on 05/08/17, JOHNSON advised that she recently requested an inventory be completed because of this investigation. JOHNSON was informed that the APD could not find the system.

Okay, so first Mary Johnson needs three quotes. But of those three quotes, the system isn't purchased from FWS, MILO, or SES. We will find out later that Starr's 'JA Tactical' business was definitely a real business, in stark contrast to what is stated later in the report...and then sort of backtracked upon...but you be the judge. So Starr was effectively acting as a distributor for L-3 Comm. This is revealed later, also. It's not unreasonable to have a 'mark up' essentially being paid by the company for making a sale. Commission. To suggest that commission is unwarranted or even illegal is ridiculous. Notice how CPL Bonin gives the quotes from all the companies the system wasn't purchased from...and then throws in the actual price of the L-3 system at the end of that paragraph. Apples to oranges. But if that biased comparison smears, Matt Starr, why not? How many systems were actually purchased? CPL Bonin discovered that Starr actually purchased THIS system for \$1,290. So how does L-3 have two different serial numbers for THIS (one) system? It's almost as if Starr purchased one system for the department and one to sell to another buyer. Could this explain his FATS post on Facebook? Is there any proof that Starr ever sold a FATS to an independent buyer? It was relayed to me by several friends of Matthew Starr that the morning he was arrested he indicated to CPL Bonin that BOTH FATS were in the back of his issued vehicle. CPL Bonin was allegedly 'not worried about that'. He sure seems concerned about these simulators in the criminal complaint.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Next, while researching STARR'S public Facebook posts and other information that is open to the public to view, I, Cpl. BONIN, observed that STARR belongs to a Facebook group called, "Police - Fire - EMS: Buy, Sell, Trade." I then went to that page and conducted a search of any posts STARR made. On 02/07/17, at 1547 HRS, STARR posted the following, "FATS \$3,000 Altoona, PA (16601) I have posted on here a couple times. I sell Firearms Training Systems. I have had numerous emails and also people / department purchases. This machine is low cost and portable. You use your own weapons and either use the scenarios that come with it or film your own. Please message me if you would like more information. Thank you"

This posting is important as it shows STARR was attempting to sell an additional Firearms Training System as late as February of 2017; the month that he wagers \$25,623 at the Rocky Gap Casino.

In order to investigate this incident more, I, Cpl. Matthew J. BONIN, applied for a search warrant on 03/07/17, at the Blair County Courthouse. This search warrant requested information on the aforementioned checks from the St. STANISLAUS KOSTKA BROTHERHOOD and the check from Thompson Pharmacy. The information I requested was into which account these checks were deposited, the name on the account, and the account numbers. The search warrant was granted and subsequently sealed. On 03/07/17, at 1434 HRS, I served said search warrant on the ARC; specifically, Samantha Jo YON, head teller. YON was unable to find any information on the two checks from St. STANISLAUS KOSTKA BROTHERHOOD. However, YON advised that the check from Thompson Pharmacy, which was written out to the Altoona Police Department, was deposited into the personal bank account of Matthew S. STARR. The account number was #22969 with the sub accounts of 007 for checking and 001 for savings. YON further advised that the two checks from St. STANISLAUS KOSTKA BROTHERHOOD were probably not deposited as the Thompson Pharmacy check caused concern because it was written out to the Altoona Police Department.

However, on 03/08/17, ARC Teller Manager Angela GOCHNOUR was able to find the checks from the St. Stanislaus Kostka Brotherhood and provided myself and Trooper GRASSMYER with copies of those checks which were requested in the search warrant. Check #4474 was dated for 08/23/16 and was cashed on 08/24/16. Check #4491 was dated 10/16/16 and was cashed 10/17/16. These were also confirmed to have been deposited into the personal bank account of Matthew S. STARR (account #22969).

Now back to the 'second' FATS. It is reasonable to believe that by the verbiage Starr uses in his post he isn't having much luck selling the second FATS. At this point we understand two systems were purchased from L-3. Perhaps he plans on selling this system to support his alleged gambling addiction? How exactly would that be illegal? Perhaps Altoona isn't the best market for such a piece of equipment? I have personally used similar systems and do not find any part of the description of this post to be misleading or fraudulent. These units regularly go for around Starr's asking price on Ebay.com. CPL Bonin's statement that this post is somehow significant is laughable. So Starr was trying to sell the second FATS system that he had purchased from L-3? How is that even remotely illegal? CPL Bonin previously established that Starr ordered two of these systems. Even lists the serial numbers. One appears to have been for APD and the other was at his discretion. Were city funds used to purchase the second system? Why isn't that noted? CPL Bonin alleges that an incomplete invoice was given to the city (lacking serial number) however it appears this only seems to reference a single system. How much of a crime is it to make an honest mistake on paperwork? Wouldn't that ultimately be Mary Johnson's responsibility to ensure the paperwork is correct and that the equipment is present and accounted for? But once again, this does not appear to even allege at any point the city is missing multiple systems. Only one.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 03/08/17, I, Cpl. Matthew J. BONIN, applied for and was granted a search warrant for STARR'S personal bank account at Altoona Roman Catholic Federal Credit Union. The bank account revealed that STARR has been spending thousands of dollars on gambling. Specifically, it revealed that STARR has been gambling at the Rocky Gap Casino located at 16701 Lakeview Rd NE, Flintstone, MD 21530. The transactions on his bank statements would show up as "Global Cash Acc 16701 Lakeview Road NorthFLINTS." The search warrant also revealed that STARR deposited the \$2000 check from the St. Stanislaus Kostka Brotherhood into his personal bank account of 22969. This deposit was made on 08/24/16 at 1506 HRS. Again, this check was made out to the Altoona Police Department, Matthew STARR. Prior to depositing the \$2,000, there was \$109.45 in his checking account. Furthermore, On 08/24/16, at 1610 HRS, 1 hour and 4 minutes after the deposit of the aforementioned check, STARR withdrew \$500 from an ATM from the PNC Bank on Beale Ave, Altoona, PA. On 08/24/16, at 1825 HRS, there is a charge of \$404 from Global Cash Acc 16701 Lakeview RD NORTHFLINTS. Another purchase of \$308.95 at Rocky Gap was made at 1833 HRS. Within approximately 4 hours of depositing the St. Stanislaus Kostka Brotherhood check into his personal bank account, STARR spent \$1200 at the Rocky Gap Casino. I confirmed this exact amount through a court order that was issued to the Rocky Gap Casino which will be described later in this affidavit of probable cause.

In regards to the other check from St. Stanislaus Kostka Brotherhood (in the amount of \$500.00), STARR did deposit this check into his personal bank account; however, he did not gamble on that particular day. On 10/17/16, when STARR deposited the other check from St. Stanislaus Kostka Brotherhood, STARR had a NEGATIVE balance of -\$480.56. With the \$500.00 deposit, it provided STARR with a positive balance of \$19.44 in his personal checking account.

On 03/09/17, the Finance Department of Altoona City provided me with the check that they issued to Outdoor City Guns for the purchase of the Beamhit 390 Firearms Training System.

The check was dated for 06/12/15 and was for the amount of \$7,654.00. This check was an M&T Bank check from the City of Altoona and was endorsed by Omar STROHM, the City of Altoona Finance Director.

Wow. So wait a minute here. CPL Bonin is alleging to be able to prove how the \$500 withdrawn in cash was spent? Does he have the bills on camera being handed off to someone? I mean anyone with a brain knows that there is absolutely no way to prove cash transactions unless you have serial numbers of the bills. I have not seen any bill serial numbers mentioned at any point in this complaint. But then at a balance of \$19.44 Starr's ready to gamble again...not. Once again this evidence is purely circumstantial and CPL Bonin is clearly reaching. Then the city finance dept issues a check for the FATS...endorsed by Strohm...nothing illegal here. Interesting that the city left that much money go and now Bonin is complaining about the amount of commission Starr made on this transaction. Shouldn't there be a better checks and balances system in place to make sure things aren't getting marked up by distributors? How often does this happen that no one has even noticed? Why is it all of a sudden a problem because Matt Starr did it? Now I'm sure many of you are saying well Starr took advantage of the system and got himself a lot of commission on the tax payer's dime. Sure he did. But the city agreed to it. How many of you can honestly say you wouldn't take advantage of such an opportunity? Is it illegal to make a crap loud of interest? No. Is it unethical? Probably. Matthew Starr isn't an attorney. He wasn't charged with any ethics violations.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 06/12/15, Matthew STARR deposited a check into his personal bank account at ARC and this check was from Outdoor City Gun in the amount of \$7454.00. The owner of Outdoor City Guns, Myron K. BIDDLE, related that STARR informed him that the City of Altoona needed to go through a Firearms Dealer to broker the purchase of a Beamhit 390 Firearms Training System. STARR informed him that he (STARR) is a representative for the firearm training system company and that he will take care of having the firearms training system shipped to the City. STARR gave BIDDLE \$200 for being the "broker" of the deal. BIDDLE confirmed that he never saw the Beamhit 390 system and further advised that Outdoor City doesn't even sell a Beamhit 390 system. This information revealed that STARR falsified the document he submitted to Mary JOHNSON which indicated that Outdoor City Guns gave a quote of \$7654.00. Outdoor City never provided STARR with a quote as STARR informed Myron BIDDLE that he just needs them to be the "broker of the transaction." A letter from Outdoor City guns was also submitted by Matthew STARR and in the letter Outdoor City Guns advised that they will "broker the sale of a Beamhit Firearms Training System for the city of Altoona's Police Department." This letter was prepared by Outdoor City Guns and was e-mailed to Matt STARR, who then gave it to the City of Altoona. The letter made no mention of a quote as Outdoor City did not sell this system. When Trooper GRASSMYER showed Myron and Anthony BIDDLE the invoice / quote that STARR submitted to the City of Altoona and to the Community Development Block Program, they did not recognize the document and advised that they did not complete that invoice / quote. The format, logo, and layout of that document submitted to Altoona City by Matt STARR matched the format, logo, and layout of a quote he also submitted to another business who purchased a Beamhit 390 system from STARR which will be described later in this affidavit. Outdoor City Guns then provided myself and Trooper GRASSMYER with the receipt that they gave to STARR when they issued him the check for \$7454.00. Again, Myron BIDDLE advised that the check was for \$7454.00, \$200 less than the original amount, because STARR gave them \$200 for being the "broker" of the deal.

STARR'S personal bank records show that from that \$7,454.00, \$6100 was deposited into his personal bank account and he retained \$1354.00. This transaction was recorded at 1405 HRS, on 06/12/15. Next, STARR'S bank records show that on 06/12/15, he spent approximately \$2,000 at the Rocky Gap Casino; the same day Altoona City issued Outdoor City the check for \$7654.00 and the same day that Outdoor City issued the check to STARR which was deposited into his personal account. When viewing STARR'S casino records from Rocky Gap, I observed that the exact amount he wagered on 06/12/15 was \$2,445. STARR'S first transaction at the casino – according to his personal bank statement – was recorded at 3:42 p.m, on 06/12/15. It takes approximately 1 hour and 15 minutes to travel to the Rocky Gap Casino from the City of Altoona. This shows that STARR was at the casino within 1 hour and 37 minutes of depositing the money that was designated for the Beamhit 390 Firearms Training System which was to be used to train Police Officers at the Altoona Police Department.

So Starr paid Outdoor City for being the 'broker' after they had already agreed to doing so? He also advised that he was responsible for ensuring that the system was shipped to the city (this seems to imply Outdoor wasn't required to have eyes on the system). I'd sure like to see a transcript of CPL Bonin's interview with Mr. Biddle. If this transaction was illegal and Biddle was compensated for it, why wasn't Biddle charged as a co-conspirator?

Once again these numbers appear to be misleading. So he deposits \$6100.00 into his personal account. Then retains \$1354.00. According to my calculations $\$7454 - 1354 = \6100 . Either CPL Bonin can't do basic math or this narrative was written incorrectly. So Starr kept some cash out? Why not mention that specifically? If he is a distributor for L-3 and the system actually cost \$1290, he could have kept a lot more. Why leave the digital paper trail of \$6100? The 1hr and 15 mins quote is once again laughable. That's in 'Google Maps Time'. Obviously someone frequenting the casino as often as they allege Starr was could make the trip in a shorter time. I've personally made this drive in 51 minutes. I do not frequent the casino. This means that Matthew Starr has AT LEAST 29 minutes to complete his first game and prove this narrative so wrong he could probably sue CPL Bonin. Now thing's really get interesting.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 03/28/17, we interviewed the Chief of Police, Deputy Chief of Police, all Lieutenants, all Sergeants, and any other officer involved with Firearms Training at the Altoona Police Department. No member of the Altoona Police Department ever saw the Beamhit 390 Firearms Training System on Altoona Police Department Property nor did anyone ever have any training on the system or provide training to anyone else using the Beamhit 390 system.

Furthermore, we noted that the check Outdoor City issued to Matthew STARR was written out to J A Tactical / Matthew STARR. We then began to investigate who or what represented J A Tactical. At the same time, we began to also investigate more about the Beamhit 390 Firearms Training System.

On 03/09/17, I, Cpl. Matthew J. BONIN, had a telephone conversation with Melissa VASILEVSKI, Director of Contracts & Empowered Official EOTech - An L-3 Communications Company. This company is located in Michigan. I asked VASILEVSKI if her company ever sold a Beamhit 390 Basic System to anyone in the Altoona, PA area; specifically, to Outdoor City Guns. She advised that her company never sold a system to Outdoor City Guns. I informed her of the price that Altoona City was charged for the Beamhit system; specifically, \$7654.00. She advised that the system sells for \$1290.00, which is wholesale cost. She advised that she would expect a dealer to mark up the price some, but \$7,654.00 is out of the question and further advised that this is a 300% markup. More specific calculations show that this is actually a 493% markup. This information from VASILEVSKI shows that Altoona City, through the Community Development Block Grant program, paid for a Beamhit system in June of 2015 that was actually never purchased.

Instead, STARR obtained the funds via a fraud and then laundered the money through Outdoor City Guns. STARR subsequently put the illegally obtained funds into his personal bank account. STARR then used a portion of the funds to gamble on the same day of the deposit. From June 12th, 2015 through June 27th, 2015, STARR wagers \$7,755.00 at the Rocky Gap Casino.

So my first question is...since CPL Bonin has obtained serial numbers for both FATS...where are they? Were they allegedly sold? Even the L-3 Comm rep is acknowledging some mark up is to be expected compared to wholesale price. Even if Starr marked up the systems by a large margin...wouldn't it be the responsibility of the folks finalizing the purchase to confirm these prices? Perhaps not. Perhaps Matt Starr isn't the first person to mark up a few prices. I recall the U.S. Army paying thousands of dollars for hammers and toilet seats. Now at this point I am going to suggest that Starr may have a gambling/drinking problem. But there is some evidence to suggest that even this isn't true later on. No one at APD was aware of this Beamhit 390 but later on they will allege that they believed Starr was having some 'issues'. This will be addressed in detail later on. For me, the lack of intervention on the part of his brothers in blue is inexcusable. But this also seems to be APD culture. The million dollar question is why did Freehling request a PSP investigation so quickly?

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Next, VASILEVSKI advised that she did sell 2 Beamhit 390 systems to a company called JA Tactical on March 19, 2013. She advised that the point of contact for JA Tactical is Matthew STARR. She advised that the systems were shipped to 301 Union Avenue, BOX 330, Altoona, PA. I conducted a search of this address and it is a postal express building. I conducted searches of JA TACTICAL and as of March of 2017, no such business currently exists in Altoona, PA.

On 03/09/17, VASILEVSKI also provided me with receipts of other items that were shipped to JA Tactical in 2012 & 2013 with Matthew STARR being listed as the point of contact for JA Tactical. Including the two aforementioned Beamhit systems, there was a total of \$11,946 in police equipment / tactical equipment purchased from L-3 Communications EOTech, Inc which was shipped to JA Tactical, 301 Union Ave Altoona, PA. On 03/13/17, I requested more information from VASILEVSKI in regards to how payment was made for the items. VASILEVSKI had another representative from L-3 Communications - Emily FAIR - provide me with documentation for some of the payments. She provided this information to me on 3/14/17. She advised that Matthew STARR provided L-3 Communications with a Pennsylvania Tax Exempt Certificate for his Company "JA TACTICAL" The License Number he wrote on the certificate was #85776754 and he subsequently signed his name to this document. This form was dated 08/07/12. According to documentation, STARR provided a First Commonwealth Bank Account to L-3 Communications EOTech, Inc in order to obtain a credit line of \$3,000 from L-3 Communications. This account number was First Commonwealth Bank Account #730736105 (checking) & Account # 1300652405 (Savings). These documents were dated in June of 2012. STARR went on to purchase a total of approx. \$11,900 in tactical equipment / police equipment. FAIR advised that the other form of payment was via a credit card; however, the company no longer has any records of that credit card as they do not retain credit card records that long.

CPL Bonin's detective skills here in determining that 301 Union Ave is a postal express building is probably the pinnacle of this entire report. This is where it starts to get really good. It's clearly stated by the manufacturer that two FATS systems were sold to Starr. Up to this point it has only been proven that one belonged to APD and that Starr attempted to sell one on Facebook. CPL Bonin claims that 'JA Tactical' is not a real business. But Starr has purchased nearly \$12K in equipment as this business. Where did it all go? No Facebook postings for any of this? None of it went to APD? Once again, the purpose of this investigation seems to be to stretch the facts, overload them with circumstantial evidence and attempt to bury Starr with it.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

In regards to the First Commonwealth Bank accounts, I observed that STARR listed these accounts on a business credit application that he submitted to L-3 Communications. After receiving this information which was provided to me by L-3 Communications EOTech, I prepared a search warrant for First Commonwealth Bank Checking Account #730736105 and Savings Account # 1300652405. I prepared this search warrant on 3/16/17 and it was granted.

On 03/27/17, I received – via mail – a letterhead from First Commonwealth Bank advising of the results of their search for Matthew STARR'S accounts that were named on the search warrant. Danielle N CRISSEY, Fraud & Security Supervisor, Assistant Vice President, advised that First Commonwealth completed a search of all checking / savings accounts for the timeframe requested. CRISSEY advised that no accounts were found under the name of Matt STARR or JA TACTICAL. It should be noted that I had a phone conversation with CHRISSEY on Tuesday, 03/21/17 at approx. 0900 HRS. CHRISSEY pointed out that First Commonwealth Bank Accounts have 10 digits. The checking account number listed only had 9 digits. The savings account provided did have 10 digits. The results of this search warrant show that STARR provided L-3 Communications with fraudulent bank account information in order to obtain business status with them.

In regards to the Beamhit 390 firearms training system, we also noted that STARR was trying to sell one of these systems through his personal Facebook page as mentioned before. Because the firearms training system for the City of Altoona is unaccounted for and because STARR was trying to sell one through Facebook, a search warrant was applied for and granted for the personal Facebook page of Matthew STARR. Through these records, we determined that STARR sold a Beamhit 390 Firearms Training System to the York Technical Institute in Altoona, PA.

Obviously to this point we can see that Starr isn't very good at completing paperwork. He leaves the serial number off the city FATS and now appears to have an extra number on the bank account of his business. Is it fraudulent if it's an honest mistake? Why didn't L-3 verify this was a real account? Bonin is now alleging that one of the aforementioned FATS were involved in the transaction with YTI. As I stated before these systems can be found regularly on Ebay.com for around \$3,000. We know Starr purchased two of these systems from L-3. Did he purchase more from an independent seller for resale? We will learn the price YTI paid for it's system. Even purchasing the system at the Ebay price, Starr would have still made a nice commission.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 03/27/17, myself and Trooper Craig GRASSMYER met with Natalie LOMBARDO-BEAVER and Mark LEDFORD at the York Technical Institute, located at 2900 Fairway Drive Altoona, PA 16602. LOMBARDO-BEAVER is the campus president. LEDFORD is the program coordinator of the Criminal Justice / First Responder program at the YTI Altoona Campus. We asked them if they purchased a Beamhit 390 system from Matthew STARR. They advised that they did. They advised that LEDFORD did the negotiating with STARR. LEDFORD advised that STARR was using the business name JA TACTICAL while the negotiations were ongoing. He related that STARR sold them a system for \$8,056.00 and this would have occurred sometime in the spring of 2015, probably around March or April of 2015. This shows that STARR made a \$6,100 profit from the sale of the Beamhit 390 system to YTI.

On 04/03/17, I prepared a search warrant to be served on YTI – Altoona. This search warrant requested all electronic transmissions; emails; text messages and attachments to those e-mails. It requested a copy of the check for purchase order #40997. The check from YTI to Matthew STARR was also obtained during the previous search warrant of STARR'S personal bank account. From this search warrant, we learned the following information from the information provided to us from YTI:

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Starting in January of 2013, STARR begins negotiations with YTI; specifically, Mark LEDFORD. He quotes YTI, \$15,200.00 for the purchase of 2 Beamhit systems. He represents himself as JA Tactical during the initial negotiations. The negotiations go on through 2015. In the spring of 2015, based off of the conversations and e-mails between LEDFORD and STARR, the purchase of the Beamhit 390 system is close to being finalized. On 02/25/15, at 1055 HRS, STARR e-mails LEDFORD and admits that JA Tactical is no longer a business and advised that the check from YTI needs to be made out to Matt STARR. LEDFORD tells STARR that he will have to fill out a new W-9 form and list the new vendor information. It's important to note that YTI will not purchase from an individual, just from a vendor. STARR completes a W-9 and even though he admitted to LEDFORD that JA Tactical no longer exists, he still lists J&A Tactical as a business on this form and puts his personal social security number on the form. Without listing JA Tactical, YTI could not buy from Matthew STARR, the individual; therefore, he provides them with a false impression that he is actually running a business so that he is able to sell the Beamhit 390 System to YTI. Next, on 04/15/15, YTI issues a check to Matthew W. STARR / J & A Tactical, 2329 16th Ave Altoona, PA 16601, for \$8,056.00 (STARR purchased the system for \$1290). This check would have been mailed to STARR at his home address listed on the check. STARR deposits the check into his personal bank account on 4/17/15 at 1421 HRS (2:21 p.m.). At the time of the deposit, STARR has a total of \$84.99 in his personal bank account. Also, I compared this transaction to STARR'S Altoona Police Department schedule and it revealed that STARR was working until 3 p.m. on 04/17/15 which reveals that STARR conducted this criminal transaction while being paid by the Altoona Police Department. I then viewed the Rocky Gap Casino Records which indicated that on April 18th, 2015 and April 19th, 2015, STARR wagered \$2,345.25.

Let's back up a minute here. How does CPL Bonin know how much Starr actually paid for the system? Why isn't the serial number listed? That should have been easy. Does YTI not still have the system in question? He can get a purchase order but not track down the actual system/serial? Surely YTI does audits and inventories. Without a serial number it is impossible to know whether this system was purchased from L-3 or from an independent seller. Sure sounds like shoddy investigative work. If I'm building this case, have serial numbers of these systems and want to prove that the alleged system in question was sold to this individual or organization, at this time, on this date, I would sure want to be able to link those serial numbers with specific transactions. Starr acknowledges 'JA Tac' is 'no longer a business' but did he have intentions of petitioning to have said business reinstated? How did Starr give a 'false impression' that he was operating a business when he explicitly mentions 'JA Tactical was no longer a business' in an email to YTI? Why did YTI go along with this transaction if they won't purchase from an individual? Did they want the system and just tell Starr to fudge the paperwork? CPL Bonin you missed some very important verbiage in this complaint. Starr conducted this ALLEGED criminal transaction while on duty. It's up to the prosecution to prove that this transaction was criminal and your lack of acceptance of that fact seems to re-enforce your malice toward this particular Defendant. At this point I feel it's necessary to ask, given my knowledge of your involvement in other cases that stink of corruption in Blair County, are you doing this investigation on behalf of someone at the Blair County Courthouse? More on that later...

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Because on the information we received from L-3 Communications and the information we received from York Technical Institute, we contacted the PA Department of Revenue in order to determine if there ever was a business called JA TACTICAL and what the status of this business is.

On Friday 04/07/17, at approx. 1000 HRS, we met with Chief of Investigations of the Commonwealth of PA Department of Revenue, Anthony S. BECCONE and Kim BEVAN, Special Agent, PA Department of Revenue. They advised that J&A Tactical was open for approx. 2 fiscal quarters in 2012 and for the first fiscal quarter in 2013. They advised that J&A Tactical reported "0" for sales at the end of the first fiscal quarter in 2013. Due to inactivity on the account, the PA Department of Revenue automatically closed out the business at the end of the first fiscal quarter in 2013; therefore, STARR could not legally operate under the name JA TACTICAL after the business was closed. They advised that STARR failed to report the \$6,100 profit he made from selling the Beamhit system to York Technical Institute in 2015. This information was obtained by viewing his personal tax returns for that year. Additionally, they advised that he failed to pay SALES TAX on the profit. BECCONE advised that these are violations of Title 72, section 7268 (sales tax) and Title 72, section 7353 (for personal income tax). He advised that these are both ungraded misdemeanors.

This is my favorite part of this complaint. Because Starr wasn't charged with either of the ungraded misdemeanors. Why? If he's making all of this unreported income the Department of Revenue should be so far up his ass that he would be able to taste his tax returns from the past five years. Why isn't that the case? This should be blood in the water for the DOR. It's interesting that upon further investigation these charges are 'added by information' by the Attorney General's Office. So CPL Bonin is so incompetent that he puts a paragraph bashing Starr about something that he may very well be able to prove, but perhaps he can't, and doesn't even file charges?! I guess it's hard to 'get rid of someone' with ungraded misdemeanors so why bother with them?

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 03/10/17, I, Cpl. Matthew J. BONIN, prepared an affidavit for Maryland Authorities in order obtain STARR'S financial history at the Rocky Gap Casino in Flintstone, Maryland. On 03/10/17, Maryland authorities applied for a court order for records from 2015-2017 based on information I had from STARR'S personal bank account records from 2015-2017. On 03/13/17, I had a phone conversation with Jason BITTINGER, Director of Security and Compliance at the Rocky Gap Casino. He advised that he does have records of STARR at the Rocky Gap Casino as far back as 2014; however, he will need a court order / subpoena for 2014-2017 in order to release the information. Based on this information, I submitted a second affidavit requesting records as far back as 2014. I obtained these records in March of 2017 and they showed that STARR had spent approx. \$140,000 from July of 2014 through the beginning of March of 2017. On 05/03/17, I submitted an affidavit of probable cause to Maryland Authorities to obtain more up-to-date casino records on STARR. I had been in conversation with Rocky Gap Security who advised that STARR is still frequenting the casino as late as the end of April of 2017. I received those records on 05/03/17. It should be noted that Matthew STARR is aware that the State Police are investigating him; however, he is still frequenting the casino.

Upon reviewing STARR'S Rocky Gap Records, I noted the following:

- STARR'S records begin on July 9th of 2014.

GAIN / LOSS AMOUNTS FOR TABLE:

- STARR'S total amount of "BUY-IN" for "TABLE" amounts to \$156,788.50
- STARR'S total amount of "WALK-WITH" for "TABLE" amounts to \$105,388
- STARR'S total amount of "TABLE WIN/LOSS" amounts to NEGATIVE -\$51,400.50

GAIN / LOSS AMOUNTS FOR SLOT:

- STARR'S "COIN-IN" for "SLOT" is \$1,199.75
- STARR'S "COIN-OUT" for "SLOT" is \$1,527.75
- STARR'S "SLOT WIN/LOSS" is +\$328.00

STARR'S LIFETIME GAIN / LOSS TOTAL SINCE July 9th, 2014:

- (NEGATIVE) -\$51,072.50

Okay, so Starr knows he is under investigation but keeps frequenting the casino? That seems suggest he doesn't believe he is doing anything illegal. He's over 21. It's legal for him to gamble. Furthermore a -\$51K isn't shit for an alleged gambling addict. I've personally seen family members go well over the -\$100K mark. It is my personal belief that CPL Bonin is personal friends with some members of security of Rock Gap Casino and these individuals may have illegally provided him with information regarding Matthew Starr.

CPL Bonin should have left this investigation up to PSP Gaming, or at least enlisted their help and expertise instead of making himself look like a fool.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 04/18/17, I, Cpl. Matthew J. BONIN, applied for a search warrant for Matthew STARR'S casino records from River's Casino in Pittsburgh, PA. While reviewing his bank statements from October of 2016, I observed that he had expenditures at this casino. On 10/11/16, STARR had \$1,006.39 in his personal checking account. STARR gambles at the casino on 10/12/16. According to his personal bank account statement, STARR has negative (-480.56) in his personal checking account. On 10/16/16, STARR solicits \$500 from the St. Stanislaus Kosta Brotherhood to purchase more fire equipment for the police department. They give STARR the \$500 and he then deposits it into his personal bank account which gives him a positive balance of \$19.44.

On 04/17/17, at approx. 1100 HRS, I spoke with Tpr. Howard SMITH, PSP Gaming, who advised that STARR does have a history at the River's Casino in Pittsburgh starting in April of 2014 through October of 2016. The search warrant was granted and served at the River's Casino. The search warrant revealed the following financial information about STARR'S gambling history at the River's Casino:

TOTAL IN: \$8837.85
TOTAL OUT: \$4442.65
NET LOSS: (\$2,395.20)

I then calculated amounts for both casinos combined (Rivers Casino & Rocky Gap Casino)

TOTAL IN: \$164,826.10

TOTAL LOSSES: -\$53,467.70

So the obvious question here is this...was any equipment ever purchased for fire investigations? Why no statement from ranking officers if equipment was or wasn't purchased? Or was it? No attempt to secure equipment tags from Mary Johnson? With this type of investigation we will never know. Let's face it, fire investigation equipment can get quite expensive. Especially if FLIR is involved. FLIR can be used both in fire and other situations so it is a dual purpose equipment but also costs tens of thousands of dollars.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Additionally, on 04/25/17, Tpr. GRASSMYER and myself had conversations with the St. Stanislaus Kosta Brotherhood members who advised that STARR frequently plays the "Pennsylvania Skills Gambling machines" games located in that venue; however, there is no way to keep track of what an individual has spent. St. Stanislaus Kosta Brotherhood is located in close proximity to STARR'S residence.

The records I received from the Rocky Gap Casino also provided us with specific dates and times that Matthew STARR was gambling at the casino. More specifically, these records would indicate at what time STARR would use his players card at the end of a table game to redeem points. There was no way to track at what time he began to play each game. The casino only retains video surveillance for 7-30 days.

On 03/16/17, I prepared a search warrant for the credit history of Matthew S. STARR. This search warrant was directed toward TransUnion. The search warrant was approved and I faxed the search warrant to TransUnion on 03/16/17, at approx. 1200 HRS. I received results of the search warrant on 03/17/17 at 1457 HRS via Fax, from TransUnion.

As of 03/17/17, the credit history of STARR revealed that his high credit was \$467,424 and his current balance is \$463,897. Furthermore, it reveals that he has 3 accounts that went to collections, 3 accounts with historical negatives, and 19 occurrences of historical negatives.

During interviews with members of the Altoona Police Department on 03/28/17, we were informed by one officer, that for the past year, he has noted that STARR consistently showed up late for work and left early from work. Furthermore, he would show up smelling of alcohol. He related that for the past 18 months, Sergeant Matthew S. STARR has basically been a part time employee of the police department.

Based on the fact that we observed many entries' on STARR'S casino records which show him at the casino between the hours of 0700 and 1600 HRS (his normal working hours) and based on the statement of the above mentioned officer who observed STARR showing up late for work and leaving early from work, I, Cpl. BONIN, requested STARR'S official Time & Attendance records from Chief Janice FREEHLING for the years 2014 through 2017 including any overtime hours he worked.

Chief FREEHLING provided us with STARR'S time and attendance records on 04/07/17 at approx. 1400 HRS.

We were also informed by Chief FREEHLING that STARR assigns himself overtime and then approves his own overtime which is then submitted to the Altoona Police Department secretary, Brenda PROSSER, who then submits it to the City of Altoona Finance Department.

It should be noted that it takes approximately 1 hour and 15 minutes (approximately 70 miles) to travel from the Altoona Police Department to the Rocky Gap Casino in Flintstone, Maryland.

'There was no way to track at what time he began to play each game'. Many of these entries are within the window of Starr being off duty. Why are they included in the complaint? CPL Bonin is grasping at straws here. This is pathetic for someone who touts their '10 years of investigative experience'. As far as the collections accounts being mentioned this does not appear to be relevant either. How are these accounts related to the alleged criminal activity reported up to this point? A single officer accuses Starr of showing up late, leaving early, and being intoxicated while on duty. Did this officer ever confront Matthew Starr with these allegations while he believed it was going on? Why not? Maybe this individual has a personal vendetta against Starr? What an opportune time to throw him to the wolves. The coward isn't even named in the complaint. Will the coward show up for trial? My money is on one of the 'boy's club'.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

We discovered the following discrepancies:

- On Sunday 05/30/2015, STARR was on Overtime from 1200-2400 HRS and his first game at the casino ends at 0008 HRS – eight minutes after his shift ended.
- On Thursday, 07/02/15, STARR works a 0700-1500 HRS shift and his first casino game ends at 1606 HRS.
- On Friday, 07/10/15, STARR works a 0700-1500 HRS shift and his first casino game ends at 1625 HRS.
- On Monday 10/12/15, STARR works a 0700-1500 HRS shift and his first game ends at 1441 HRS, which is 19 minutes prior to the end of his scheduled shift with the Altona Police Department.
- On Monday, 02/01/16, STARR works a 1000-1800 HRS shift and his first casino game ends at 1709 HRS, which is 51 minutes prior to the end of his scheduled shift.
- On Wednesday, 02/10/16, STARR works a 0800-1600 HRS shift and his first casino game ends at 1705 HRS, 1 hour and 5 minutes after his scheduled shift ended.
- On Wednesday, 06/15/16, STARR works a 0800-1600 HRS shift and his first casino game ends at 1611 HRS.
- On Wednesday, 07/13/16, STARR works a 0800-1600 HRS shift and his casino game ends at 0655 HRS, which is 1 hour and 5 minutes prior to the start of his shift.
- On Wednesday, 7/13/16, STARR works a 0800-1600 HRS shift and then works an additional 4 hours of Aggressive Driving Overtime from 1600-2000 HRS. Casino records show that STARR ends a casino game at 1723 HRS, which is when he was being paid overtime by the City of Altona.
- On Friday, 07/22/16, STARR works a 0800-1600 HRS shift and casino records show that he ended a game at 0410 HRS, 3 hours and 50 minutes prior to the start of his shift.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- On Monday, 07/18/16, STARR works a 0800-1600 HRS shift and then works an additional 4 hours of overtime from 1600-2000 HRS. STARR'S first game at the casino ends at 2135 HRS, 1 hour and 35 minutes after the end of his Overtime detail.
- On Wednesday, 08/17/16, STARR works a 0800-1600 HRS shift. Casino records show that STARR ended his first game at 1522 HRS.
- On Tuesday, 10/04/16, STARR works a 0700-1500 HRS shift. STARR approves himself for overtime from 0600-1000 HRS showing that he is getting paid for his regular shift at the same time he is making overtime pay from 0700-1000 HRS. The Altoona City Finance Department confirmed through their records that he was paid for both his normal hourly rate and his overtime rate for these instances of "double-dipping"
- On Wednesday, 10/05/16, STARR works a 0700-1500 HRS shift. STARR approves himself for overtime from 0600-1000 HRS showing that he is getting paid for his regular shift at the same time he is making overtime pay from 0700-1000 HRS. Again, he is double dipping on this day.
- On Thursday, 10/06/16, STARR works a 0700-1500 HRS shift. STARR approves himself for overtime from 0600-1000 HRS showing that he is getting paid for his regular shift at the same time he is making overtime pay from 0700-1000 HRS. Again, he is double dipping on this day.
- On Friday, 10/07/16, STARR works a 0700-1500 HRS shift. STARR approves himself for overtime from 0600-1000 HRS showing that he is getting paid for his regular shift at the same time he is making overtime pay from 0700-1000 HRS. Again, he is double dipping on this day.

On 10/01/16 - 10/02/16, STARR wagers \$2,187 at the Rocky Gap Casino. On 10/04/16, STARR has a balance of \$26.83 in his personal checking account. On 10/05/16, he has a negative balance of -\$78.17. On 10/06/16, he has a negative balance of \$-140.73. As stated above, from 10/04/16 - 10/07/16, STARR steals 16 hours of overtime from the City at a rate of \$45.49 per hour which totals \$727.84.

- On Wednesday, 10/26/16, STARR works a 0600 - 1400 HRS shift. STARR works and approves himself for two separate overtime details on 10/26/16. The first overtime detail begins at 1500 HRS and ends at 1900 HRS. This is designated as an Aggressive Driving Overtime Detail. The second overtime begins at 1600 HRS and ends at 2400 HRS. This is designated as a Saturation Detail in which Sgt. STARR is listed as the only officer doing the saturation detail. These records show that STARR received double payment during the hours from 1600 - 1900 HRS at a rate of \$47.76 per hour; therefore, during those 3 hours he was making \$95.52 per hour. Additionally, there is no record of STARR handling an incident or assisting with a call from 1500 HRS to 2400 HRS.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

- On Wednesday, 11/2/16, STARR works a 0800-1600 HRS shift and then works an overtime detail from 1600-2000 HRS. Casino records verify that while STARR was getting paid overtime pay by the City of Altoona (rate of \$47.76), he was actually gambling at the Rocky Gap Casino.
- On Monday, 11/7/16, STARR works a 0800 - 1600 HRS shift. STARR also works an overtime detail from 1600-2000 HRS. Casino records show that STARR ends his first casino game at 1711 HRS, again while he was being paid overtime pay by the City of Altoona. In addition to stealing the 4 hours of overtime, it also shows that he had to leave work early that day to be able to end a casino game within 1 hour and 11 minutes of the end of his scheduled shift.
- On Friday, 11/25/16, STARR is on a scheduled day off; however, he scheduled himself for an overtime detail from 1600-2000 HRS and listed it as an aggressive driving detail. Casino records show that he ended his first game at 1633 HRS which show that he is getting paid overtime pay rate by the City of Altoona while gambling at the casino.
- On Wednesday, 2/8/17, STARR works a 0800-1600 HRS shift. Casino records show that he ends a casino game at 1532 HRS. This shows that STARR was still being paid by the City of Altoona to work his normal shift and it shows that he left work early to gamble.
- On Wednesday, 2/15/17, STARR works a 0800-1600 HRS shift and his first casino game ends at 1657 HRS.

STARR'S normal hourly rate is \$30.33 per hour.

STARR'S overtime rate during normal business hours is \$45.49 per hour.

STARR'S overtime rate during post business hours (shift differential) is \$47.76 per hour.

Read and judge for yourself. A few of these indicate Starr may have left work early to go to the casino. But most do not. Why are they included here? It's almost as if someone wanted to stack the deck against Matt Starr...but why? Listing Starr's overtime pay rate more than once is inflammatory, rather than objective. A not so well articulated slam piece.

AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 04/20/17, I, Cpl. Matthew J. BONIN, discovered that Matthew STARR was the organizer of an online "gofundme" campaign to benefit Brad BLAIR who is the brother of Krista BLAIR. Krista BLAIR is known to be dating Matthew STARR. The gofundme online campaign can be found by using the following hyperlink: <https://www.gofundme.com/27s6ysk>

On 04/20/17, I viewed this campaign at the aforementioned hyperlink and the site advised that a total of \$3,465 was raised to benefit Brad BLAIR. I observed that this campaign began in June of 2016. This campaign was to benefit Brad BLAIR who had a heart attack and the money was to be designated for his medical costs and travel expenses. I then began to review STARR'S personal bank account records which were obtained via another search warrant. I discovered that from 06/10/16 through 06/14/16, gofundme had deposited \$3182.27 into STARR'S personal bank account at the Altoona Roman Catholic Federal Credit Union. GoFundMe does retain a small fee which would account for the difference of the complete amount raised for Brad BLAIR.

On 04/21/17, at 1325 HRS, I had a conversation with Angela GOCHNOUR, head teller manager at STARR'S bank, ARC Federal Credit Union. I asked her about the deposits into STARR'S account that show up as "WePay SV9T." She advised that these are from gofundme.com. I asked her how she knows they are from gofundme. She advised that she knows this to be from gofundme based on her past experience of other clients getting funds from gofundme.

On 04/20/17, I spoke with Brad BLAIR, via telephone, at approx. 1620 HRS. I asked Brad if there were any fundraisers for him after his heart attack. He advised that there was a fundraiser and it was through gofundme. He advised that his sister's boyfriend, who is a city cop, organized the campaign. I asked Brad how he received the funds from gofundme. He advised that his mother, Cathy BLAIR, was the one who was handling his money and advised that she received payment from Matt STARR. On 04/20/17, I spoke with Cathy BLAIR, via telephone, at approx. 1630 HRS. I asked her about the gofundme campaign with her son Brad BLAIR and how she received payment. She advised that she received two payments from Matt STARR. She related that she received the first one around January 17th of 2017 and it was a check for \$1000. She advised that she received another payment - in cash - around February 21st and this payment was for \$1735. I asked Cathy BLAIR the reason it took so long to receive payment from STARR and she advised STARR told her that gofundme got hacked and they were late getting him the money. She also advised that he informed her that they take a percentage and that's why he only gave him \$2735 instead of an amount closer to \$3465.

It's important to remember these numbers in reference to the *GoFundMe*.

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I then reviewed STARR'S bank account in January and February of 2017. He wrote the \$1000 check to Cathy BLAIR on 01/17/17. On that day, STARR had a balance of negative (-320.30); therefore, he did not have the funds to cover the payment to Cathy BLAIR for the gofundme.com money. On 01/18/17, STARR received a check from his father, Peter STARR, for \$1000. He then obtains a check from Richard MCELLOWNEY on 01/18/17 for \$4,000.00. Immediately after depositing the \$4,000 check, he makes a cash withdrawal of \$3,500. On 01/19/17, he has a negative balance of (-330.00) in his personal checking account. On 01/23/17, he deposits a check for \$1,696.75 into his account. At the time of that deposit, he had a balance of negative (-\$394.38). The check for \$1696.75 was a Highmark Insurance check designated for the payment of an AMED transport of STARR'S ex-wife, Jamie MATTAS. It is evident that based on these transactions, STARR uses the money of other individuals - including an insurance check - to be able to cover the cost of the \$1000 he gave to Cathy BLAIR for the gofundme fundraiser.

Cathy BLAIR then cashes the check for \$1,000 on 01/25/17. STARR doesn't get paid by the Altoona City Police Department until January 27th.

In regards to the \$1735 in cash that STARR gave to Cathy BLAIR which was approximately around the 21st of February of 2017, STARR had a balance of \$231.57 in his account on 02/21/17. He then received a check from Wendy Sue BOONE for \$9500.00. He withdraws \$2,000 from his account on 02/22/17. It is evident that STARR then uses Wendy BOONE'S money to be able to cover the additional payment to Cathy BLAIR for the gofundme money. STARR wagers \$25,623.00 in February of 2017 at the Rocky Gap Casino.

In other interviews with other people, STARR was soliciting money from others under the guise that he needed this money to pay bills for basic living expenses, not for gambling the money at the casino.

In regards to the gofundme money that was deposited into STARR'S personal bank account; I found that STARR gambled this money at the Rocky Gap Casino. In June of 2016, STARR wagers \$3,278.75 at the Rocky Gap Casino. Again, the amount deposited into his personal checking account from gofundme was \$3182.27. This money was to be designated for Brad Blair to cover his medical costs. In July of 2016, 1 month after the gofundme deposits, STARR wagers \$20,440.00 at the Rocky Gap Casino. In August of 2016, STARR wagers \$6,260.00 at the Rocky Gap Casino.

From June to August of 2016, STARR wagered a total of \$29,978.75 at the Rocky Gap Casino.

The shuffling of funds and the allegations by CPL Bonin here are ridiculous. The Blair's were paid for the Go Fund Me account. How, when, or where is irrelevant. The funds were given to the family. The family was harassed by CPL Bonin as he expected them to testify against Matthew Starr. If Starr is gambling all of his money away at the casino then it is reasonable to assume he may not be able to pay his bills. Such solicitation for money to pay his bills can not be seen as fraudulent as his own coworkers have neglected to intervene in his alleged gambling/alcohol addictions. Whether blue, green, or yellow, the failures of the brotherhood should be highly scrutinized. Coworkers have clearly indicated to CPL Bonin that they believed Matt Starr had a drinking problem. Why was this not relayed to Matt Starr five years ago?

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As stated before, STARR does not pay Cathy BLAIR until January and February of 2017 for the gofundme funds that were designated for Brad BLAIR. Additionally, his bank statements clearly show that he didn't even use his personal money to pay Cathy BLAIR; instead, he used deposits from money that he obtained from other individuals and from a medical insurance check that were to be used for a medical transport of his ex-wife.

Because of this information, I prepared and requested a search warrant be issued for the aforementioned gofundme account which was organized by Matthew STARR. The search warrant was approved and served on gofundme. I received results from the search warrant which confirmed that the money was deposited into STARR'S personal bank account in June of 2016. The search warrant revealed that 37 people donated money which totaled \$3465.

Your affiants believe the above to be true and correct and respectfully requests the DEFENDANT answer to these charges...

This really takes the cake. Not only can CPL Bonin not provide the serial numbers of these FATS systems earlier...now he's proporting to know exactly where each electronic cent of Starr's bank account went. Either the end parties were paid or they weren't. In this case the end and legally appropriate party was paid. It's interesting Starr's ex wife is mentioned here. You'd think CPL Bonin would have referenced her before this. After all she was the one leaking all the information to Harry Miller to be posted on the Altoona and Surrounding Area Corruption Facebook page. What a reliable source. What this criminal complaint doesn't address is the allegations that were relayed to the page about Starr allegedly being involved with Wendy Boone and that Boone had mafia ties. I have found no evidence that either are true. This does however, appear to be a fairy tale told by a gold digging ex-wife that would rather see Starr in jail because it makes the family situation with her new husband 'easier' if the kids want nothing to do with their real father.

Now for the real important stuff. Matthew Starr was the investigator on the Steven Hackney Murder case. Starr was in the middle of securing testimony against Taylor Griffith, daughter of now Prothonotary, Robin Patton, when he was suddenly suspended from duty. The aforementioned criminal complaint spans for years. It acknowledges that coworkers had concerns about Starr's alcohol abuse and missing work. Why wasn't this an issue for nearly five years? But only quickly became an issue when Starr was about to make an arrest in the Hackney case? Specifically, Taylor Griffith, daughter of Prothonotary Robin Patton? Starr had also allegedly secured some information pertaining to a monetary transaction sent by Robin Patton to her daughter, while Taylor was a fugitive from justice. I'm not sure why Robin Patton is such a powerful force in Blair County but there is no disputing that she is. Who else can allegedly forge a signature on a car title and have it go away? Who else gets to allegedly fabricate documents removing someone from ARD a few months early when questions are raised about why ARD wasn't revoked because of new charges? It must be convenient to magically find new documents the day your daughter is finally arrested for murder.

It's also interesting to note that for all the allegations of gambling and drinking habitually, which is now against Starr's bail conditions, Starr has not had a single violation. It's been well over a year since he was arrested. During a bail hearing, in which his attorney's requested his conditions be lowered so he could obtain employment, the motion was denied. I certainly hope that Robin Patton's alleged affair with Deputy AG Dave Gorman isn't impacting this case.

Bill Higgins allegedly terrorized Bedford County for years. After his exploits were finally exposed in the official eye he was removed from office and offered no prison time in exchange for guilty pleas to misdemeanors. Why is Attorney General Josh Shapiro's Office so hell bent on crucifying Matthew Starr and sending him to prison for years, on the basis of this laughable investigation, when he is only accused of stealing money? Not violating anyone's rights. Not using his authority to coerce sexual favors. Not destroying lives simply because he can. So what happened to equal protection under the law? Equal justice under the law? No one's going to argue that considering the allegations, the way the AG Office handled the Higgins case felt like a travesty of justice. We all know you played politics, Josh Shapiro. But choices have consequences. If you are willing to set the bar that low, this entire case and the vigorous pursuit of felony charges against Matthew Starr are an absolute travesty of justice.

I, Christopher William Irvin, believe that CPL Matthew J. Bonin is incompetent, malicious, and incapable of conducting any type of professional investigation. I respectfully request that all aspects of this case be reviewed and investigated by a higher authority.

v/r

Christopher W. Irvin