IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY

No. 1154 Disciplinary Docket No. 3

COUNSEL,

Petitioner

No. 81 DB 2006

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:

LISA REO JENKINS,

Attorney Registration No. 51250

Respondent

(Philadelphia)

ORDER

PER CURIAM:

AND NOW, this 27th day of December, 2006, there having been filed with this Court by Lisa Reo Jenkins her verified Statement of Resignation dated November 15, 2006, stating that she desires to resign from the Bar of the Commonwealth of Pennsylvania in accordance with the provisions of Rule 215, Pa.R.D.E., it is

ORDERED that the resignation of Lisa Reo Jenkins be and it is hereby accepted and she is disbarred on consent from the Bar of the Commonwealth of Pennsylvania, and it is further ORDERED that she shall comply with the provisions of Rule 217, Pa.R.D.E. Respondent shall pay costs, if any, to the Disciplinary Board pursuant to Rule 208(g), Pa.R.D.E.

A True Copy Patricia Nicola

As of: December 27, 2006

Chief Clerk

Supreme Court of Pennsylvania

BEFORE THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,: No. 1154, Disc. Docket

Petitioner: No. 3 - Supreme Court

:

: No. 81 DB 2006

ν.

: Atty. Regis. No. 51250

LISA REO JENKINS,

Respondent : (Philadelphia)

RESIGNATION UNDER Pa.R.D.E. 215

Lisa Reo Jenkins hereby tenders her unconditional resignation from the practice of law in the Commonwealth of Pennsylvania in conformity with Pa.R.D.E. 215 ("Enforcement Rules") and further states as follows:

- 1. She is a formerly admitted attorney in the Commonwealth of Pennsylvania, having been admitted to the bar on or about December 15, 1987. Her attorney registration number is 51250.
- 2. She desires to submit her resignation as a member of said bar.
- 3. Her resignation is freely and voluntarily rendered; she is not being subjected to coercion or duress and she is fully aware of the implications of submitting this resignation.
- 4. She is aware that there is presently pending a disciplinary proceeding into allegations that she has been

guilty of misconduct, based upon her conviction of criminal charges as more fully set forth in the Petition for Discipline, filed August 28, 2006. A true and correct copy of the Petition for Discipline is attached hereto and made a part hereof as "Exhibit A."

- 5. She acknowledges that on January 27, 2006, she was found guilty in the Court of Common Pleas of Philadelphia County of Forgery (four counts), 18 Pa.C.S.A. §4101, and Tampering With Public Records or Information (four counts), 18 Pa.C.S.A. §4911.
- 6. She acknowledges that on April 7, 2006, the Honorable Thomas Dempsey imposed a sentence of four years of reporting probation for each crime, to run concurrently; 100 hours of community service to be performed within six months; and \$237 in costs.
- 7. She acknowledges that these convictions constitute a per se ground for discipline under Rule 203 of the Pennsylvania Rules of Disciplinary Enforcement. A true and correct copy of the Bills of Information showing the convictions is attached to the Petition for Discipline as "Appendix E."
- 8. She submits the within resignation because the said convictions stand as a <u>per se</u> ground for discipline under the Enforcement Rules, and because she is guilty of the crimes.

- is fully aware that submission of Resignation Statement is irrevocable and that she can only apply for reinstatement to the practice of law pursuant to the provisions of Enforcement Rule 218(b).
- 10. She is fully aware that pursuant to Pa.R.D.E. 215(c), this Resignation Statement will be a matter of public record, as Respondent was personally served with the Petition for Discipline on September 11, 2006, and did not file an answer within twenty days.
- 11. She acknowledges that she is fully aware of her right to consult and employ counsel to represent her in the instant but Aconsulted and acted She has has not retained proceeding. upon the advice of counsel in connection with her decision to execute the within resignation.

It is understood that the statements made herein are subject to the penalties of 18 Pa.C.S., Section 4904 (relating to unsworn falsification to authorities).

Signed this 15th day of Wovenly 2006.

BEFORE THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 1154, Disc. Docket

Petitioner : No. 3 - Supreme Court

:

v. : No. 81 DB 2006

: Atty. Reg. No. 51250

LISA REO JENKINS, : Atty. Reg. No. Respondent : (Philadelphia)

PETITION FOR DISCIPLINE

Petitioner, Office of Disciplinary Counsel, by Paul J. Killion, Esquire, Chief Disciplinary Counsel, and by Amelia C. Kittredge, Esquire, Disciplinary Counsel, files the within Petition for Discipline and charges Respondent, Lisa Reo Jenkins, with professional misconduct in violation of the Pennsylvania Rules of Disciplinary Enforcement ("Pa.R.D.E.") and Rules of Professional Conduct ("RPC") as follows:

1. Petitioner, whose principal office is located at Suite 1400, 200 North Third Street, Harrisburg, Pennsylvania 17101 is invested, pursuant to Pa.R.D.E. 207, with the power and duty to investigate all matters involving alleged misconduct of an attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all

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disciplinary proceedings brought in accordance with the various provisions of said Rules of Disciplinary Enforcement.

- 2. Respondent, Lisa Reo Jenkins, was born on April 5, 1961, and was admitted to practice law in the Commonwealth on December 15, 1987. Respondent's attorney registration mailing address is 428 Meadowbrook Drive, Huntington Valley, PA 19006. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.
 - 3. By Order dated August 2, 2006, effective September 1, 2006, the Supreme Court of Pennsylvania placed Respondent on temporary suspension pursuant to Pa.R.D.E. 214(d)(2) and referred Respondent's criminal conviction matter, as set forth in parapraphs 5-12, infra, to the Disciplinary Board pursuant to Pa.R.D.E. 214(f)(1). A true and correct copy of the Order is attached as "Appendix A."
 - 4. Respondent did not appeal her convictions.

CHARGE

5. By Presentment dated September 4, 2003, in a case captioned In Re County Investigating Grand Jury, Misc. No. 01-00-8944, a Philadelphia County Investigating Grand Jury recommended that Respondent be charged with four counts each of Forgery, 18 Pa.C.S.A. §4101, Unsworn Falsification to Authorities, 18 Pa.C.S.A. §4904, Tampering With or Fabricating Physical Evidence, 18 Pa.C.S.A. §4910, Tampering With Public

Records or Information, 18 Pa.C.S.A. §4911, and Obstructing Administration of Law or Other Governmental Function, 18 Pa.C.S.A. §5101. A copy of the Grand Jury Presentment is attached as "Appendix B."

- 6. The Grand Jury Presentment charged that on November 30, 2001, Respondent, while appearing in the Philadelphia Court of Common Pleas to litigate Traffic Court appeals on behalf of four clients, made unauthorized changes to guilty plea colloquy forms in order to reduce the grading and/or eliminate additional charges; and forged the initials of the Assistant District Attorney in charge in the Traffic Court on that date.
- 7. A Supervising Judge of the Court of Common Pleas of Philadelphia County approved the Presentment by Findings and Order dated September 4, 2003. A true and correct copy of the Findings and Order is attached as "Appendix C."
- 8. On September 4, 2003, the Philadelphia District Attorney's Office filed a Criminal Complaint charging Respondent with four counts each of the crimes approved for prosecution by the Grand Jury, in a case captioned Commonwealth v. Lisa Jenkins, MC 03-09-5315 (Phila. Municipal Ct.). A true and correct copy of the Criminal Complaint is attached as "Appendix D."
 - 9. On February 2, 2004, the District Attorney of

Philadelphia County filed Bills of Information in the Court of Common Pleas of Philadelphia County, Criminal Section, in a case captioned *Commonwealth v. Lisa Jenkins*, CP0401-0781. A copy of the Bills of Information is attached as "Appendix E."

- 10. On January 23, 2006, Respondent proceeded to trial before the Honorable Thomas Dempsey and a jury, and on January 27, 2006, the jury returned verdicts of guilty on four counts of Forgery, 18 Pa.C.S.A. §4101, and four counts of Tampering With Public Records or Information, 18 Pa.C.S.A. § 4911.
- 11. On April 7, 2006, Judge Dempsey imposed a sentence of four years of reporting probation for each crime, to run concurrently; 100 hours of community service to be performed within six months; and \$237 in costs. On that date, the prosecutor nolle-prossed the remaining Bills of Information.
- 12. Forgery, 18 Pa.C.S.A. §4101, and Tampering With Public Records or Information, 18 Pa.C.S.A. §4911, are felonies of the third degree, punishable by imprisonment of up to seven years. 18 Pa.C.S.A. §1103(3). Therefore, Forgery and Tampering With Public Records or Information are "serious crime[s]," as defined by Pa.R.D.E. 214(i).
- 13. Respondent's convictions constitute a per se ground for discipline under Pa.R.D.E. 203(b)(1).
- 14. By her conduct as alleged above, Respondent violated the following Rules of Professional Conduct and Rule of

Disciplinary Enforcement:

- a. RPC 8.4(b), which provides that it is professional misconduct for a lawyer to commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects;
- b. RPC 8.4(c), which states that it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit, or misrepresentation;
- c. RPC 8.4(d), which provides that it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice; and
- d. Pa.R.D.E. 203(b)(1), which states that conviction of a crime, which under Enforcement Rule 214 (relating to attorneys convicted of crimes) may result in suspension, shall be grounds for discipline.

WHEREFORE, Petitioner prays that your Honorable Board appoint, pursuant to Pa.R.D.E. 205, a Hearing Committee to hear testimony and receive evidence in accordance with Rule 214(f)(1) on the sole issue of the extent of the final discipline to be imposed, and at the conclusion of said hearing, to make such findings of fact, conclusions of law,

and recommendations for discipline as it may deem appropriate.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

Paul J. Killion Chief Disciplinary Counsel

Amelia C. Kittredge

Disciplinary Counsel

Attorney Registration No. 28760

Seven Penn Center, 16th Floor 1635 Market Street Philadelphia, PA 19103 (215) 560-6296

BEFORE THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 1154, Disc. Docket

Petitioner : No. 3 - Supreme Court

:

v. : No. 81 DB 2006

LISA REO JENKINS, : Atty. Reg. No. 51250

Respondent : (Philadelphia)

<u>VERIFICATION</u>

The statements contained in the foregoing Petition for Discipline are true and correct to the best of my knowledge or information and belief and are made subject to the penalties of 18 Pa.C.S. \$4904, relating to unsworn falsification to authorities.

(ing wor 15, 2006

Amelia C. Kittredge

Disciplinary Counsel

IN THE SUPREME COURT OF PENNSYLVANIA

In the Matter of : No. 1154 Disciplinary Docket No. 3

LISA REO JENKINS : Board File No. C1-06-376

(Court of Common Pleas of

Philadelphia, Trial Division, Criminal

Section, No. 04-01-0781)

Attorney Registration No. 51250

(Philadelphia)

<u>ORDER</u>

PER CURIAM:

AND NOW, this 2nd day of August, 2006, a Rule having been entered by this Court on May 25, 2006, pursuant to Rule 214(d)(1), Pa.R.D.E., directing Lisa Reo Jenkins to show cause why she should not be placed on temporary suspension and no response thereto having been filed, it is hereby

ORDERED that the Rule is made absolute; Lisa Reo Jenkins is placed on temporary suspension pursuant to Rule 214(d)(2), Pa.R.D.E., and she shall comply with all the provisions of Rule 217, Pa.R.D.E.; and the matter is referred to the Disciplinary Board pursuant to Rule 214(f)(1), Pa.R.D.E.

A True Copy Patricia Nicola

As of: August 2, 2006

Chief Cler

Supreme Court of Pennsylvania

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY TRIAL DIVISION, CRIMINAL SECTION

IN RE

MISC. NO. 01-00-8944

COUNTY INVESTIGATING

GRAND JURY

C - 15

PRESENTMENT

TO THE HONORABLE C. DARNELL JONES, II, SUPERVISING JUDGE:

We, the County Investigating Grand Jury of September 26, 2001, having been duly charged by the Count to investigate the facts and circumstances surrounding the tampering with four written guilty plea colloquy forms by an attorney appearing in the Court of Common Pleas within the City and County of Philadelphia on November 30, 2001, having obtained knowledge of such matter from witnesses sworn by the Court and testifying before us, finding reason thereon reasonable grounds to believe, and so believing, that various violations of the oriminal law have occurred, upon our respective oaths, not fewer twelve concurring, do hereby make this Presentment to the Court.

FOREPERSON

County Investigating Grand Jury

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
TRIAL DIVISION, CRIMINAL SECTION

IN RE

MUSC. NO. 01-00-8944

COUNTY INVESTIGATING

GRAND JURY

C - 15

PRESENTMENT

TO THE HONORABLE C. DARNELL JONES, II, SUPERVISING JUDGE:

We, the County Investigating Grand Jury of September 26, 2001, were impaneled pursuant to the Investigating Grand Jury Act, 42 Pa.C.S.A. § 4541 et. seq., and were charged to investigate, inter alia, the facts and circumstances surrounding tempering with four written guilty plea colloquy forms by an attorney appearing in the Court of Common Pleas within the City and County of Philadelphia on November 30, 2001.

On that date, four clients of attorney LISA JENKINS, Esquire appeared before the Honorable Joyce S. Kean of the Court of Common Pleas to litigate their traffic court appeals.

JENKINS' and her clients, Robert Jackson (No. 01-915770), Maher Lami (No. 01-915773),

George Milstein (No. 01-915778), and Petros Panagiotides (No. 01-915787) were all provided with written guilty plea colloquies which memorialized plea negotiations with the District Attorney's Office. Before JENKINS' clients could formally enter their pleas of guilty, the Commonwealth --- represented by Assistant District Attorney Joseph Kahn --- discovered that unauthorized changes had been made to the colloquy forms further reducing the grading and/or eliminating additional charges. Upon his discovery, JENKINS physically tried to remove the forms from ADA Khan's hands. ADA Khan immediately brought this to the attention of Judge Kean. In response, JENKINS sought an "off-the-record" side-bar conference. ADA Khan objected. He then described the changes to the Court. ADA Khan noted for the record that his

initials had been forged next to changes made on each of the questioned guilty plea forms.

JENKINS subsequently tried to withdraw the pleas on behalf of all of her clients so that she could "refile" on another day. She claimed that she was "late" for another matter in Bucks County and could not remain. Her client, George Milstein terminated her representation at the bar of the court and proceeded with his guilty plea as originally negotiated with the Commonwealth. Judge Kean — over the objection of the Commonwealth — allowed JENKINS to withdraw the guilty pleas without prejudice on behalf of her remaining clients.

JENKINS appeared before this Grand Jury and testified that she "may have" made each of the unauthorized changes to the four colloquy forms further reducing the charges and penalties in favor of her clients. She claimed that "There was no intention to forge anything." However she admitted that where "[Assistant District Attorney Joseph Kahn] didn't sign, I signed his name.

Where he didn't complete the plea forms and the charges, I completed them."

RECOMMENDATIONS

Based upon all of the evidence presented to us, we, the County Investigating Grand Jury of September 26, 2001, recommend that LISA JENKINS be charged with FOUR (4) counts each of the following offenses:

18 Pa.C.S.A. § 4101 Forgery

18 Pa.C.S.A. § 4904 Unsworn Falsification to Authorities

18 Pa.C.S.A. § 4910 Tampering with or Fabricating Physical Evidence

18 Pa.C.S.A. § 4911 Tampering with Public Records

18 Pa.C.S.A. § 5101 Obstructing Administration of Law or Other Governmental Function

CONCLUSION

We, the Philadelphia County Investigating Grand Jury of September 26, 2001, therefore recommend that based upon all of the evidence presented to us, the criminal complaints specified above in this Presentment be filed by the Philadelphia District Attorney's Office.

FOREPERSON

County Investigating Grand Jury

Dated 9/4/03

In the court of common pleas of philadelphia county trial division, criminal section

IN RE

MISC. NO. 01-00-8944

COUNTY INVESTIGATING

GRAND JURY

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FINDINGS AND ORDER

AND NOW, this 4 day of August, 2003, after having examined the Presentment of the County Investigating Grand Jury of September 26, 2001, which recommends the arrest of LISA JENKINS on the following charges (four counts each):

18 Pa.C.S.A. § 4101 Forgery

18 Pa.C.S.A. § 4904 Unsworn Falsification to Authorities

18 Pa.C.S.A. § 4910 Tampering with or Fabricating Physical Evidence

18 Pa, C.S A. § 4911 Tempering with Public Records

18 Pa.C.S.A. § 5101 Obstructing Administration of Law or Other Governmental Function this Court finds that the said Presentment is within the authority of the Investigating Grand Jury and is otherwise in accordance with the provisions of the Grand Jury Act. In view of this finding, the Court hereby accepts the Presentment and refers this matter to the District Attorney of Philadelphia for further action.

BY THE GOURT:

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PAB 409

COMMONWEALTH OF PENNSYLVANIA PHILADELPHIA COUNTY

CRIMINAL COMPLAINT

FELONY P/H

DC# 03-71-00396

COMMONWEALTH OF PENNSYLVANIA

MC# 0309 53/5

COMMONWEALTH OF PENNSYLVANIA VS. LISA JENKINS

- I, THE UNDERSIGNED, DO HEREBY STATE UNDER OATH OR AFFIRMATION
- (1) MY NAME IS-DETECTIVE HOWARD BIDDLE #997, DISTRICT.
 ATTORNEY'S REPRESENTATIVE
- (2) I ACCUSE LISA JENKINS (DOB 04/05/61) -SS# 167-52-6345) WHO LIVES AT 124 Chestmut Street.

 Philadelphia PA, 19106, 700 Welch rd, Apr. D-17, Huntington Valley PA 19006

 WITH VIOLATING THE PENAL LAWS OF PENNSYLVANIA ON OR ABOUT November 30, 2001 IN THE COUNTY OF PHILADELPHIA.
- (3) THE ACTS COMMITTED BY THE ACCUSED WERE

 SEE ATTACHED AFFIDAVIT OF PROBABLE CAUSE INCORPORATED BY
 REFERENCE, ARREST WARRANT NUMBER # 266819

IN VIOLATION OF FA. PENAL LAWS, SECTION (S) AND TITLE (S): 4101 Forgery F-J (4cts), 4904 Unswarn Falaification authorities. M-Z (4cts), 4910 Tampering with or Fabricating Physical Evidence, 4911 Tampering with public records F-J (4cts), 5101 Obstructing Administration of Law or other Governmental Function M-Z(4cts).

ALL OF WHICH IS AGAINST THE PEACE AND DIGNITY OF THE COMMONWEALTH OF PA.

(4) I ASK THAT A WARRANT OF ARREST OR A SUMMONS BE ISSUED AND THAT THE ACCUSED BE REQUIRED TO ANSWER THE CHARGES I HAVE MADE. THIS COMPLAINT HAS BEEN REVIEWED AND APPROVED BY ADA ERIC GIBSON

(5) I SWEAR TO OR AFFIRM THE WITHIN COMPLAINT UPON MY KNOWLEDGE, INFORMATION AND BELIEF, AND SIGN IT ON 06/12/03, BEFORE PHILADELPHIA MUNICIPAL COURT JUDGE / BAIL COMMISSIONER.

SIGNATURE OF AFFLANT

ON 09/04/03, THE ABOVE NAMED AFFIANT SWORE OR AFFIRMED THAT THE FACTS SET-FORTH IN THE COMPLAINT WERE TRUE AND CORRECT TO THE BEST OF HIS/HER KNOWLEDGE, INFORMATION AND BELIEF, AND SIGNED IT IN MY PRESENCE. I BELIEVE THE WITHIN AFFIANT TO BE A RESPONSIBLE PERSON AND THAT THERE IS PROBABLE CAUSE FOR THE ISSUANCE OF PROCESS.

ISSUING AUTHORITY SEAT

COMMONWEALTH OF PENNSYLVANIA PHILADELPHIA COUNTY

CRIMINAL COMPLAINT

FELONY P/H

DC# 03-71-00396

COMMONWEALTH OF PENNSYLVANIA

MC#

commonwealth of Pennsylvania Vs. Lisa Jenkins

- I, THE UNDERSIGNED, DO HEREBY STATE UNDER OATH OR AFFIRMATION
- (1) MY NAME IS DETECTIVE HOWARD BIDDLE #997, DISTRICT ATTORNEY'S REPRESENTATIVE
- (2) I ACCUSE LISA JENKINS (DOB 04/05/61) -SS# 167-51-6345) WHO LIVES AT 124 Chestnut Street.

 Philadelphia PA, 19106, 700 Welsh rd, Apr. D-17, Huntington Valley PA 19006

 WITH VIOLATING THE PENAL LAWS OF PENNSYLVANIA ON OR ABOUT November 30, 2001 IN THE COUNTY OF PHILADELPHIA.
- (3) THE ACTS COMMITTED BY THE ACCUSED WERE.

 SEE ATTACHED AFFIDAVIT OF PROBABLE CAUSE INCORPORATED BY
 REFERENCE, ARREST WARRANT NUMBER # 266829

IN VIOLATION OF FA. PENAL LAWS, SECTION (S) AND TITLE (S): 4101 Forgery F-3 (4cts), 4904 Unsworn Falalfication authorities. M-2 (4cts), 4910 Tampering with or Fabricating Physical Evidence, 4911 Tampering with public records F-3 (4cts), 5101 Obstructing Administration of Law or other Governmental Function M-2(4cts).

ALL OF WHICH IS AGAINST THE PEACE AND DIGNITY OF THE COMMONWEALTH OF PA.

(4) I ASK THAT A WARRANT OF ARREST OR A SUMMONS BE ISSUED AND THAT THE ACCUSED BE REQUIRED TO ANSWER THE CHARGES I HAVE MADE. THIS COMPLAINT HAS BEEN REVIEWED AND APPROVED BY ADA ERIC GUISON.

(5) I SWEAR TO OR AFFIRM THE WITHIN COMPLAINT UPON MY KNOWLEDGE, INFORMATION AND BELIEF, AND SIGN IT ON 08/12/03, BEFORE PHILADELPHIA MUNICIFAL COURT JUDGE / BAIL COMMISSIONER.

SIGNATURE OF AFFIANT

ON 09/04/03, THE ABOVE NAMED AFFIANT SWORE OR AFFIRMED THAT THE PACTS SET FORTH IN THE COMPLAINT WERE TRUE AND CORRECT TO THE BEST OF HIS/HER KNOWLEDGE, INFORMATION AND BELIEF, AND SIGNED IT IN MY PRESENCE. I BELIEVE THE WITHIN AFFIANT TO BE A RESPONSIBLE PERSON AND THAT THERE IS PROBABLE CAUSE FOR THE ISSUANCE OF PROCESS.

ISSUING AUTHORITY SEAT

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WARRANT OF ARRE



Commonwealth of Pennsylvania $\left. \right\}$ SS.

ио. 266829

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AFFIDAVIT OF PROBABLE CAUSE

Howard A. Biddle, being duly sworn according to law, does hereby deposes and say:

- 1. I, Howard A. Biddle (hereinafter "affiant"). Am a Philadelphia Police Detective, Badge #997, detailed to the Philadelphia District Attorney's Office and presently assigned to the Special Investigations Unit. I have been a sworn law enforcement officer since October 1991.
- 2. Your affiant has participated in hundreds of arrest for, and investigations of, violations of the Pennsylvania Crimes Code and the Election code, Title 18 and 25 PA.C.S.
- 3. As a member of the District Attorney's Special Investigation Unit I have conducted many sensitive and complex investigation into corrupt and criminal conduct by "court employees" and others acting in an official capacity.
- 4. That the County Investigating Grand Jury of September 26, 2001, was impanied pursuant to the Investigating Grand Jury Act, 42 Pa.C.S.A. § 4541 et. seq., and was charged to investigate, inter alia, the facts and circumstances surrounding the tampering with four written guilty pleas colloquy forms by an attorney appearing in the Court of Common Pleas within the City and County of Philadelphia on November 30, 2001.
- 5. I have read the presentment which was approved by the Grand Jury on August 14, 2003, and which was reviewed and accepted by the Honorable C. Darnell Jones, II, Supervising Judge on September 4, 2003. (A copy of the presentment is attached hereto and incorporated herein by reference.) I have reviewed the sworn testimony given before the Grand Jury by ADA Joseph Khan, Lisa Jenkins Esq. and others, and reviewed numerous documents which were made available to the Grand Jury.

6. Based upon my review of the testimony before the Grand Jury and the documents produced for the Grand Jury, I believe the testimony of the various witnesses is accurately summarized in the presentment

7. Based upon my review of the evidence, I have concluded that there is probable cause to believe that Lisa Jenkins Esquire engaged in illegal conduct, which is accurately summarized in the attached presentment. I have also determined that there is probable cause to conclude that Lisa Jenkins Esquire violated the following laws of the commonwealth of Pennsylvania;

18 Pa.C.S.A. § 4101 Porgery, F-3 (4 count each)

18 Pa.C.S.A. § 4904 Unsworn Falsification to Authorities M-2 (4 count each)

18 Pa.C.S.A. § 4910 Tampering with or Fabricating Physical Evidence, M-2 (4 count each)

18 Pa.C.S.A. § 4911 Tempering with Public Records, F-3 (4 count each)

18 Pa C.S.A. § 5101 Obstructing Administration of Law or other Governmental Function, M-2 (4 count each)

(Signature of Affiant)

Detective Howard A. Biddle #997

Special Investigation Unit District Attorney's Office

Sworn to (or Subscriber)

Before me this 4 Day

Of September, 2003

(Signature of Issuing Authority)

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APPENDIX E

OMMONWEALTH OF PENNSYLVANIA CUNTY OF PHILADELPHIA

0401-0781:1/1:

CRIMINAL SECTION

THE DISTRICT ATTORNEY OF PHILADELPHIA BY: THIS INFORMATION CHARGES THAT ON OR ABOUT: 11/30/01 IN PHILADELPHIA, LISA JENKINS

WITH INTENT TO DEFRAUD OR INJURE ANOTHER PERSON, OR KNOWING THAT HE OR SHE HAS FACILITATING A FRAUD OR INJURY TO BE PERPETRATED BY ANOTHER PERSON,

- 1. ALTERED A WRITING OF ANOTHER WITHOUT THE OTHER'S AUTHORITY'
- 2. HADE, COMPLETED, EXECUTED, AUTHENTICATED, ISSUED OR TRANSFERRED A WRITING SO THAT IT PURPORTED TO BE THE ACT OF ANOTHER WHO DID NOT AUTHORIZE THAT ACT, OR TO HAVE BEEN EXECUTED AT A TIME OR PLACE OR IN A NUMBERED SEQUENCE OTHER THAN HAS IN FACT THE CASE; OR TO: BE A COPY OF AN ORIGINAL WHEN NO SUCH ORIGINAL EXISTED
- 3. UTTERED A WRITING WHICH HE OR SHE KNEW TO BE FORGED IN A MANNER SPECIFIED IN PARAGRAPHS (1) AND (2) OF 18 PA.C.S. 4101(A)

PERSON INJURED -- JOSEPH KHAN WRITING--WRITTEN GUILTY PLEA FORMS FOR TRAFFIC COURT APPEALS NO. OF COUNTS -

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18 PA.C.S. 4101(A).

All of which is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

USTRICT ATTORNEY
LYNNE ABRAHAM ANAHITA BALSARA APPROVED 2/02/04

0401 0781 1/1

CRIMINAL SECTION

THE DISTRICT ATTORNEY OF PHILADELPHIA BY: THIS INFORMATION CHARGES THAT ON OR ABOUT 11/30/01 IN PHILADELPHIA, LISA JENKINS

- 1. KNOWINGLY: MADE A FALSE ENTRY IN, OR FALSE ALTERATION OF, ANY RECORD, DOCUMENT, OR THING BELONGING: TO, OR RECEIVED OR KEPT BY, THE GOVERNMENT FOR INFORMATION OF RECORD, OR REQUIRED BY! LAW TO BE KEPT BY OTHERS FOR INFORMATION OF THE GOVERNMENT
- 2. MADE, PRESENTED, OR USED ANY RECORD, ODCUMENT, OR THING! KNOWING IT TO BE FALSE, AND WITH INTENT THAT IT BE TAKEN AS A GENUINE PART OF INFORMATION OR RECORDS REFERRED TO IN PARAGRAPH (A)(1): OF 18 PACC.S. 4911
- 3. INTENTIONALLY AND UNLAWFULLY DESTROYED, CONCEALED, REMOVED OR OTHERWISE IMPAIRED THE VERITY OR AVAILABILITY; OF ANY RECORD; DOCUMENT OR THING BELONGING TO, OR RECEIVED OR KEPT BY; THE GOVERNMENT FOR INFORMATION OR RECORD, OR REQUIRED BY LAW TO BE KEPT BY OTHERS FOR INFORMATION OF THE GOVERNMENT.
- 4. THE INTENT OF THE ACTOR WAS TO DEFRAUD OR INJURE ANOTHER NO. OF COUNTS -

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18 PA.C.S. 4911(A):

All of which is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

2/02/04

DISTRICT ATTORNEY
LYNNE ABRAHAM

ANAHITA BALSARA

APPROVEL

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In the Common Pleas Court of the County of Philadelp

COMMONWEALTH OF PENNSYLVANIA COUNTY OF PHILADELPHIA

0401.0781 1/1.

CRIMINAL SECTION

THE DISTRICT ATTORNEY OF PHILADELPHIA BY THIS INFORMATION CHARGES THAT ON OR ABOUT 11/30/01 IN PHILADELPHIA, LISA: JENKINS

- 1. WITH INTENT TO MISLEAD A PUBLIC SERVANT IN PERFORMING HIS OR HER OFFICIAL FUNCTION; MADE A WRITTEN FALSE STATEMENT WHICH HE OR SHE DID NOT BELIEVE TO BE TRUE
- 2. WITH INTENT TO MISLEAD A PUBLIC SERVANT IN PERFORMING HIS OR HER OFFICIAL FUNCTION, SUBMITTED OR INVITED RELIANCE ON A WRITING: WHICH HE OR SHE KNEW TO BE FORGED, ALTERED OR OTHERWISE LACKING IN AUTHENTICITY:
- 3. WITH INTENT TO MISLEAD A PUBLIC SERVANT IN PERFORMING HIS OR HER OFFICIAL FUNCTION, SUBMITTED OR INVITED RELIANCE ON ANY SAMPLE, SPECIMEN, MAP, BOUNDARY MARK, OR OTHER OBJECT WHICH HE OR SHE KNEW TO BE FALSE
- 4. MADE A WRITTEN FALSE STATEMENT WHICH HE OR SHE DID NOT BELIEVE ID BE TRUE, ON OR PURSUANT TO A FORM BEARING NOTICE, AUTHORIZED BY LAW, TO THE EFFECT THAT FALSE STATEMENTS MADE THEREIN ARE PUNISHABLE

NO. OF COUNTS -

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18 PA.C.S. 4904.

All of which is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

ASSISTANT DISTRICT ATTORNEY ANAHITA BALSARA DISTRICT ATTORNEY
LYNNE ABRAHAM APPROVED 2/62/04

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In the Common Pleas Court of the County of Philadels

COMMONWEALTH OF PENNSYLVANIA COUNTY OF PHILADELPHIA

0401 0781 1/1.

CRIMINAL SECTION

THE DISTRICT ATTORNEY OF PHILADELPHIA BY THIS INFORMATION CHARGES THAT ON OR ABOUT 11/30/01 IN PHILADELPHIA: LISA: JENKINS

BELIEVING THAT AN OFFICIAL PROCEEDING OR INVESTIGATION WAS PENDING OR WAS ABOUT TO BE INSTITUTED.

1. ALTERED, DESTROYED, CONCEALED OR REMOVED A RECORD, DOCUMENT, OR THING WITH INTENT TO IMPAIR ITS VERITY OR AVAILABILITY: IN SUCH PROCEEDING OR INVESTIGATION

2. MADE, PRESENTED; OR USED A RECORD, DOCUMENT, OR THING KNOWING IT TO BE FALSE AND MITH INTENT TO MISLEAD A PUBLIC SERVANT WHO WAS OR MAY; HAVE BEEN ENGAGED IN SUCH PROCEEDINGS OR INVESTIGATION

NO. OF COUNTS -

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18 PA.C.S. 4910.

All of which is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

2/02/04

DISTRICT ATTORNEY
LYNNE ABRAHAM

SSISTANT DISTRICT ATTORNEY ANAMITA: BALSARA

APPROVED

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In the Common Pleas Court of the County of Philadelp

COMMONWEALTH OF PENNSYLVANIA COUNTY OF PHILADELPHIA

0401:0781.1/1

CRIMINAL SECTION

THE DISTRICT ATTORNEY OF PHILADELPHIA BY THIS INFORMATION CHARGES THAT ON OR ABOUT 11/30/01 IN PHILADELPHIA: LISA JENKINS

BELIEVING THAT AN OFFICIAL PROCEEDING OR INVESTIGATION WAS PENDING OR WAS ABOUT TO BE INSTITUTED,

1. ALTERED, DESTROYED, CONCEALED OR REMOVED A RECORD, DOCUMENT, OR THING WITH INTENT TO IMPAIR ITS VERITY OR AVAILABILITY IN SUCH PROCEEDING OR INVESTIGATION

2. MADE, PRESENTED, OR USED A RECORD, DOCUMENT, OR THING KNOWING IT TO BE FALSE AND WITH INTENTITO MISLEAD A PUBLIC SERVANT WHO WAS OR MAY HAVE BEEN ENGAGED IN SUCH PROCEEDINGS OR INVESTIGATION

NO. OF COUNTS -

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18 PA.C.S. 4910.

All of which is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

2/02/04

LYNNE ABRAHAN

ASSISTANT DISTRICT ATTORNEY ANAHITA BALSARA

APPROVED

COMMONWEALTH OF PENNSYLVANIA COUNTY OF PHILADELPHIA SS.

In the Common Pleas Court of the County of Philadelph

0401 0781 1/1

CRIMINAL SECTION

THE DISTRICT ATTORNEY OF PHILADELPHIA BY: THIS INFORMATION CHARGES THAT ON OR ABOUT. 11/30/01 IN PHILADELPHIA.

LISA JENKINS

INTENTIONALLY OBSTRUCTED, IMPAIRED, OR PERVERTED THE ADMINISTRATION OF LAW OR OTHER GOVERNMENTAL FUNCTION BY FORCE, VIOLENCE, PHYSICAL INTERFERENCE, OR OBSTACLE, BREACH OF OFFICIAL DUTY; OR OTHER UNLAWFUL ACT

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18 PA.C.S. 5101.

All of which is against the Act of Assembly and the peace and dignity of the Commonwealth of Pennsylvania.

2/02/04

LYNNE ABRAHAM

ANAHITA BALSARA

APPROVEU