

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF **MONROE**



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA

Magisterial District Number: **43-3-03**

DEFENDANT:

VS.
(NAME and ADDRESS)

MDJ Hon. **DANIEL KRESGE**
Address: **P.O. BOX 736**
TANNERSVILLE, PA 18372

ROBERT **JOSEPH** **DEHARDER**
First Name Middle Name Last Name
5171 RIVER RD
PO BOX 14511
MONTANDON, PA 17850

Telephone: **570-629-1460**

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-318-19	Date Filed 8/15/19	OTN/LiveScan Number U 7392405	Complaint/Incident Number 20180604M0438	Request Lab Service? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 11/24/1947	POB	Add'l. DOB	Co-Defendants? <input type="checkbox"/>
AKA	First Name	Middle Name	Last Name	Gen.
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
HAIR COLOR <input type="checkbox"/> Gry (Gray) <input type="checkbox"/> Red (Red/Aubn) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> Blk (Black) <input type="checkbox"/> Ong (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Ink./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> Bin (Blonde / Strawberry)	EYE COLOR <input type="checkbox"/> Blk (Black) <input type="checkbox"/> Blu (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknowr)			
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location			WEIGHT (lbs.) 200
FBI Number	MNU Number			Ft. HEIGHT in. 6 03
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fingerprint Classification			

DEFENDANT VEHICLE INFORMATION

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

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

(The attorney for the Commonwealth may require the complaint, arrest warrant affidavit, or both, be approved by the attorney for the Commonwealth prior to filing. See 9A. R. Crim. § 507.)

Catherine Piralli (Name of the attorney for the Commonwealth - Please Print or Type) [Signature] (Signature of the attorney for the Commonwealth) 8/15/19 (Date)

I, DETECTIVE MARIO ORLANDO (Name of the Affiant)	I-07/34962 PSP/MPOETC - Assigned Affiant ID Number & Badge #
of MONROE COUNTY OFFICE OF THE DISTRICT ATTOR (Identify Department or Agency Represented and Political Subdivision)	PA045013A (Police Agency ORI Number)
do hereby state:	
1. <input checked="" type="checkbox"/> I accuse the above named defendant who lives at the address set forth above <input type="checkbox"/> I accuse the defendant whose name is unknown to me but who is described as _____	
<input type="checkbox"/> I accuse the defendant whose name and popular designation are unknown to me and whom I have therefore designated as John Doe or Jane Doe	
with violating the penal laws of the Commonwealth of Pennsylvania at [206] JACKSON TWP (Subdivision Code) (Place-Political Subdivision)	
700 YOKE TER STROUDSBURG	
in MONROE County [45] on or about 8 DECEMBER 2015 (County Code) (Offense Date)	



POLICE CRIMINAL COMPLAINT

Docket Number CR-378-19	Date Filed 8/15/19	OTN/LiveScan Number U739240-5	Complaint/Incident Number 20180604M0438
Defendant Name	First ROBERT	Middle JOSEPH	Last DEHARDER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA § 213. - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older 0				
<input checked="" type="checkbox"/> Lead?	1	4107	A2 of the	18	1	F2		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description (Include the name of statute or ordinance): Dec Bus Pract - Sale Less Than Quant								

Acts of the accused associated with this Offense:
 On or about Tuesday, December 8, 2015, in the County of Monroe, Robert Joseph DEHARDER purporting to be the owner of We Do Metal Roofs did in the course of business knowingly and/or recklessly sell, offer or expose for sale, or deliver less than the represented quantity of any commodity or service by entering into an agreement for the installation of a metal roof onto a residence belonging to 69 year old, [REDACTED] issued check no. 1775 in the amount of \$20,000.00 payable to Metal Roofs USA Corp., as a deposit on the installation. The check was deposited into Jersey Shore State Bank checking account: xxx3498. To date no work has begun and no material has been provided, also no refund has been offered or made.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older 0				
<input type="checkbox"/> Lead?	2	517.8	A(2) of the	73	1	F2		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description (Include the name of statute or ordinance): HOME IMPROVEMENT FRAUD								

Acts of the accused associated with this Offense:
 On or about Tuesday, December 8, 2015, in the County of Monroe, Robert Joseph DEHARDER purporting to be the owner of We Do Metal Roofs is guilty of home improvement fraud because with intent to defraud 69 year old, [REDACTED] and with knowledge that he is facilitating a fraud, DEHARDER received an advance payment from [REDACTED], who issued check no. 1775 in the amount of \$20,000.00 payable to Metal Roofs USA Corp. for performing home improvement services and providing home improvement materials and fails to perform or provide such services or materials when specified in the contract taking into account any force majeure or unforeseen labor strike that would extend the time frame or unless extended by agreement with the owner and fails to return the payment received for such services or materials which were not provided by that date.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older 0				
<input type="checkbox"/> Lead?	3	3922	A1 of the	18	1	F3		
PennDOT Data (if applicable)	Accident Number		<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone				
Statute Description (Include the name of statute or ordinance): Theft By Decep-False Impression								

Acts of the accused associated with this Offense:
 On or about Tuesday, December 8, 2015, in the County of Monroe, Robert Joseph DEHARDER purporting to be the owner of We Do Metal Roofs did intentionally obtain or withheld property, belonging to 69 year old, [REDACTED] by creating or reinforcing a false impression namely by entering into an agreement for the installation of a metal roof onto a residence belonging to [REDACTED] issued check no. 1775 in the amount of \$20,000.00 payable to Metal Roofs USA Corp., as a deposit on the installation. The check was deposited into Jersey Shore State Bank checking account: xxx3498. To date no work has begun and no material has been provided, also no refund has been offered or made.



POLICE CRIMINAL COMPLAINT

Docket Number CR-378-19	Date Filed 8/15/19	OTN/LiveScan Number U 739 240-5	Complaint/Incident Number 20180604M0438
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<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older 0
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<input type="checkbox"/> Lead?	4	3925	A	of the	18	1	F3		
	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of statute or ordinance):
RECEIVING STOLEN PROPERTY

Acts of the accused associated with this Offense:
 On or about Tuesday, December 8, 2015, in the County of Monroe, Robert Joseph DEHARDER purporting to be the owner of We Do Metal Roofs is guilty of theft if he intentionally receives, retains, or disposes of movable property of another knowing that it has been stolen, or believing that it has probably been stolen, unless the property is received, retained, or disposed with intent to restore it to the owner. That is to say DEHARDER entered into an agreement for the installation of a metal roof onto a residence belonging to 69 year old, [REDACTED] issued check no. 1775 in the amount of \$20,000.00 payable to Metal Roofs USA Corp., as a deposit on the installation. The check was deposited into Jersey Shore State Bank checking account: xxx3498. To date no work has begun and no material has been provided, also no refund has been offered or made.



POLICE CRIMINAL COMPLAINT

Docket Number CR-378-19	Date Filed 8/15/19	OTN/LiveScan Number U7392405	Complaint/Incident Number 20180604M0438
Defendant Name	First ROBERT	Middle JOSEPH	Last DEHARDER

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of section 4904 of the Crimes Code (18 PA C.C. 4904) relating to unsworn falsification to authorities.
- This complaint is comprised of the preceding page(s) numbered 1 through 3.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of Assembly, or in violation of the statutes cited. **(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)**

August 15, 2019
(Date)

[Signature]
(Signature of Affiant)

AND NOW, on this date 8/15/19 I certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed before a warrant can be issued.

43-3-03
(Magisterial District Court Number)

[Signature]
(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number CR-378-19	Date Filed 8/15/19	OTN/LiveScan Number U739240-5	Complaint/Incident Number 20180604M0438
Defendant Name	First ROBERT	Middle JOSEPH	Last DEHARDER

AFFIDAVIT of PROBABLE CAUSE

Detective Mario Orlando, being duly sworn according to law deposes and says:

I am a law enforcement officer of the Commonwealth of Pennsylvania within the meaning of section 5702 of Title 18 Pa. C.S.A. and as such am empowered to make arrests for criminal offenses enumerated in Title 18 Pa. C.S.A. I am a member of the Criminal Investigations Division of the Monroe County Office of the District Attorney, a position I have held since January 2015.

Your affiant has been personally involved in this investigation concerning the theft of \$20,000.00 in US Currency from [REDACTED], herein referred to as the VICTIM, by Robert Joseph DEHARDER, herein referred to as the ACCUSED. This affidavit is based on in part conversations with other law enforcement agents, witnesses, observations and my examination of reports and records. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

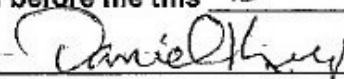
During my investigation I discovered that on Tuesday, December 8, 2015 the VICTIM entered into an agreement with We Do Metal Roofs Representative Michael William BLOOM. The agreement was for the installation of a metal roof onto their residence, located at [REDACTED] in Jackson Township. The total price of the installation was \$26,000.00. The VICTIM issued check no. 1775 in the amount of \$20,000.00 payable to Metal Roofs USA Corp., as a deposit on the installation. The check was deposited into Jersey Shore State Bank checking account: 1703498 on Thursday, December 10, 2015. To date no work has begun and no material has been provided, also no refund has been offered or made. I also discovered that the ACCUSED is the owner, operator of multiple contracting companies. They include, We Do Metal Roofs.com, Metal Roofs USA Corp, Bedrock Waterfalls, Rock Works USA, and We Do Marketing LLC to name a few.

An interview with BLOOM revealed that he began working for DEHARDER in December of 2011 as a salesman for his company. That BLOOM would receive emails from their call

I, DETECTIVE MARIO ORLANDO (I-07), BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.


(Signature of Affiant)

Sworn to me and subscribed before me this 15th day of August, 2019
Date , Magisterial District Judge

My commission expires first Monday of January, 2024





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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

center in Lewisburg, PA for appointments with potential clients and he would go to the appointments the following day. If a sale was made BLOOM would write the contract, collect the check, take the completed contract and check to DEHARDER's office in Milton, PA and drop everything off to either DEHARDER's wife or DEHARDER himself. That is where BLOOM's involvement with the entire process would end and DEHARDER took over from that point.

DEHARDER was the person who made all the decisions, including having his sales personnel including BLOOM create a company, BLOOM's being Metal Roofs USA Corp. and open a business account, BLOOM's being the Jersey Shore State Bank Business Checking Account No.: 1703498 for his company. BLOOM explained that even though the company was his, DEHARDER paid the fees associated with making his company, Metal Roofs USA Corp. BLOOM continued to say that DEHARDER would have them put their company's name on the contracts they made up during their sales but everything would ultimately go through his company, We Do Metal Roofs.

BLOOM recalled that DEHARDER would make it mandatory that he be added to their accounts as a signatory. An analysis of the bank records was conducted by Chief KERCHNER and me which indicates that DEHARDER was the individual making the majority of the withdrawals from BLOOM's account. In December 2015 the account's beginning balance was \$400.00. There were 22 deposits totaling \$181,962.66, including the \$20,000.00 check from [REDACTED] and 83 debits totaling \$166,117.47 leaving an ending balance of \$16,239.19. Of the 20 cash withdrawals made, 2 were completed by BLOOM, totaling \$12,530.00 and 18 were completed by DEHARDER, totaling \$65,979.48. A total of 59 checks cleared during the month totaling \$65,108.89. DEHARDER issued all of those checks. Of those checks, check no.: 2217 was issued to BLOOM for \$1,500.00. During the month of December 2015 BLOOM received a total of \$14,030.00 in cash and a check. DEHARDER withdrew \$65,979.48 in cash. It has not been determined what checks were written for business expenses and what checks were written for personal expenses. DEHARDER was also using BLOOM's account to pay other employees, bills, materials for jobs and would withdraw various sums of money. BLOOM states that he does not know the reasons for these withdrawals. BLOOM also stated that DEHARDER paid him using checks from his company, other companies he either owned or was a signatory on the associated account. BLOOM states that he was also paid in cash and at times would withdraw his weekly income from the aforementioned Jersey Shore State Bank account.

When asked about the withdrawals he made in December, BLOOM reiterated that he only took \$1,500.00 from this account when he received authorization from DEHARDER. We presented BLOOM with the bank records that show 2 other withdrawals in December 2015 totaling \$12,530.00, one made on December 16, 2015 in the amount of \$5,015.00 and the other on December 17, 2015 in the amount of \$7,515.00. BLOOM stated that he was unsure but recalled DEHARDER asking him to sign 2 checks around that time. A review of the bank records shows that they were in fact withdrawal slips. BLOOM also confirmed our discovery that HOBBIE's deposit was deposited into this account but does not know what it was used for.

During our conversation with BLOOM, he advised us that he knew that DEHARDER would always carry large amounts of cash on him, that he also had a gambling addiction and would frequent the Mohegan Sun Casino. BLOOM recalled many times DEHARDER would take him there and pay for his lunch, particularly one time when DEHARDER placed a bet for \$10,000.00 as they were on their way out of the casino, at which point BLOOM voiced his disapproval of the bet. BLOOM states after that interaction, DEHARDER no longer brought him to the casino anymore. BLOOM also inferred that DEHARDER had a relationship with a female and would pay for her lodging at a local motel for a few months.

Your affiant respectfully requests that a warrant of arrest be issued for the ACCUSED to answer to the charges set forth in this criminal complaint and affidavit of probable cause.



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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

(Signature of Affiant)