

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 3080 Disciplinary Docket No. 3
Petitioner : No. 92 DB 2024
v. : Attorney Registration No. 85285
MICHAEL J. SANGEMINO, : (Chester County)
Respondent :
:

ORDER

PER CURIAM

AND NOW, this 28th day of January, 2026, upon consideration of the Verified Statement of Resignation, Michael J. Sangemino is disbarred on consent from the Bar of this Commonwealth. See Pa.R.D.E. 215. Respondent shall comply with the provisions of Pa.R.D.E. 217 and pay costs to the Disciplinary Board. See Pa.R.D.E. 208(g).

A True Copy Nicole Traini
As Of 01/28/2026

Attest: Nicole Traini
Chief Clerk
Supreme Court of Pennsylvania

**BEFORE THE DISCIPLINARY BOARD OF
THE SUPREME COURT OF PENNSYLVANIA**

IN THE MATTER OF : No. 3080 Disciplinary Docket No. 3
MICHAEL J. SANGEMINO : No. 92 DB 2024
: Attorney Registration No. 85285
: (Chester County)

**RESIGNATION
UNDER Pa.R.D.E. 215**

Michael J. Sangemino, hereby tenders his unconditional resignation from the practice of law in the Commonwealth of Pennsylvania in conformity with Pennsylvania Rule of Disciplinary Enforcement 215 (Pa.R.D.E.) and states as follows:

1. He is a formerly admitted attorney, having been admitted to the Bar of the Commonwealth of Pennsylvania on May 8, 2000 and assigned attorney registration number 85285.
2. On September 16, 2024, the Office of Disciplinary Counsel ("ODC") filed a Petition for Issuance of a Rule to Show Cause why Mr. Sangemino should not be placed on Temporary Suspension pursuant to Pa.R.D.E. 208(f)(5) ("Petition") in connection with ODC files C2-24-721, C2-24-795, and C2-24-861.

**FILED
01/12/2026
The Disciplinary Board of the
Supreme Court of Pennsylvania**

3. By Order dated September 17, 2024, Pennsylvania Disciplinary Board Chair John Rafferty issued an Order and Rule to Show Cause why Mr. Sangemino should not be placed on Temporary Suspension pursuant to Pa.R.D.E. 208(f)(5).

4. He failed to respond to the Order and Rule to Show Cause.

5. By Order dated November 18, 2024, effective December 18, 2024, the Supreme Court of Pennsylvania placed him on temporary suspension pursuant to Pa.R.D.E. 208(f)(5).

6. He failed to file with the Disciplinary Board a verified statement as required by Pa.R.D.E. 217(e)(1).

7. He desires to submit his resignation as a former member of the Bar of the Commonwealth of Pennsylvania.

8. His resignation is freely and voluntarily rendered; he is not being subjected to coercion or duress, and he is fully aware of the implications of submitting this resignation.

9. He acknowledges that he is fully aware of his right to consult with and employ counsel to represent him in this proceeding. He has retained, consulted with, and acted upon the advice of counsel in connection with his decision to execute this resignation.

10. He is aware that there is presently an investigation into allegations

that he has been guilty of misconduct, the nature of which allegations have been made known to him by the service of the Petition filed on September 16, 2024. A true and correct copy of the Petition with exhibits is attached as "Attachment A".

11. He acknowledges that the material facts upon which the complaints are predicated and contained in Attachment A are true.

12. He is aware that there are presently pending disciplinary proceedings instituted against him pursuant to Rule 214, Pa.R.D.E. relating to his criminal conviction in the Chester County Court of Common Pleas in the case *Commonwealth of Pennsylvania v. Michael Joseph Sangemino*, Docket Number: CP-15-CR-0002181-2025, for his breach of fiduciary duties and theft of client funds. A true and correct copy of the *Criminal Complaint and Affidavit of Probable Cause* is attached as "Attachment B".

13. He acknowledges that the material facts which form the basis for his criminal matter are true and that he entered a plea of guilty on December 18, 2025 to 1) three felony counts of Theft by Failure to Make Required Disposition of Funds Received, in violation of Title 18 of the Pennsylvania Crimes Code, Section 3927(a); 2) three felony counts of Dealing in Proceeds of Unlawful Activities, in violation of Title 18, Section 5111(a)(2); 3) one felony count of Forgery, in violation of Title 18, Section 4101(a)(2); and 4) one

misdemeanor count of Theft by Failure to Make Required Disposition of Funds Received, in violation of Title 18, Section 3927(a). A true and correct copy of the Guilty Plea Colloquy is attached as "Attachment C".

14. He submits this resignation because he knows that he could not successfully defend himself against charges of professional misconduct within the disciplinary system.

15. He is fully aware that his submission of this resignation statement is irrevocable and that he can only apply for reinstatement to the practice of law pursuant to Pa.R.D.E. 218(b) and (c).

16. He is aware that, pursuant to Pa.R.D.E. 215(c), the fact that he has tendered his resignation shall become a matter of public record immediately upon delivery of the resignation statement to Disciplinary Counsel or the Board Prothonotary.

17. Upon entry of the order disbarring him on consent, he will promptly comply with the notice, withdrawal, resignation, trust account, and cease-and-desist provisions of Pa.R.D.E. 217(a), (b), (c) and (d).

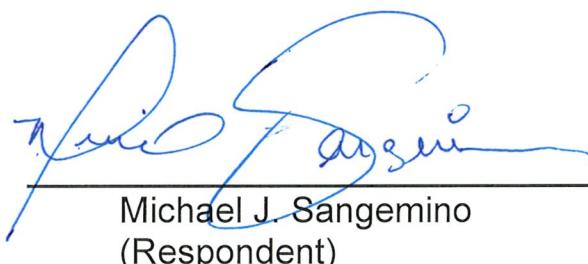
18. After entry of the order disbarring him on consent, he will file a verified statement of compliance as required by Pa.R.D.E. 217(e)(1).

19. He is aware that, pursuant to Pa.R.D.E. 217(e)(3), the waiting period for eligibility to apply for reinstatement to the practice of law under

Pa.R.D.E. 218(b) shall not begin until he files the verified statement of compliance required by Pa.R.D.E. 217(e)(1).

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

Signed this ^{9th} day of January, 2026.



Michael J. Sangemino
(Respondent)

WITNESS: Stewart R. Daffith

Attachment A

BEFORE THE DISCIPLINARY BOARD
OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, Petitioner	:	No. 92 DB 2024
v.	:	ODC File Nos. C2-24-721; C2-24-795; C2-24-861
MICHAEL J. SANGEMINO, Respondent	:	Attorney Reg. No. 85285 (Chester County)

**PETITION FOR ISSUANCE OF A RULE TO SHOW CAUSE WHY
RESPONDENT SHOULD NOT BE PLACED ON TEMPORARY
SUSPENSION PURSUANT TO Pa.R.D.E. 208(f)(5)**

Petitioner, Office of Disciplinary Counsel (hereinafter, "ODC"), by
Thomas J. Farrell, Esquire, Chief Disciplinary Counsel, and by Emily R.
Provencher, Esquire, Disciplinary Counsel, respectfully petitions the
Disciplinary Board to issue a Rule to Show Cause Why Respondent Should
Not be Placed on Temporary Suspension pursuant to Pennsylvania Rule of
Disciplinary Enforcement 208(f)(5) and in support thereof states:

1. ODC, whose principal office is located at the Pennsylvania Judicial Center, 601 Commonwealth Avenue, Suite 5800, P.O. Box 62675, Harrisburg, Pennsylvania, 17106, is invested, pursuant to Rule 207 of the

ATTACHMENT A

FILED
09/16/2024
The Disciplinary Board of the
Supreme Court of Pennsylvania

Pennsylvania Rules of Disciplinary Enforcement ("Pa.R.D.E."), with the power and duty to investigate all matters involving alleged misconduct of any attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of said Rules of Disciplinary Enforcement.

2. Respondent, Michael J. Sangemino, Esquire, was born in August 1966 and was admitted to practice law in the Commonwealth of Pennsylvania on May 8, 2000. His attorney registration number is 85285. His office is located at 224 East Street Road, Suite B2E, Kennett Square, Pennsylvania 19348.

3. Respondent is currently on active status.

4. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court of Pennsylvania.

5. Respondent has no history of discipline.

6. Pursuant to Pa.R.D.E. 207(b)(1), ODC is conducting an investigation initiated by complaints from Senior Deputy Attorney General Pamela S. Fingerhut (ODC File No. C2-24-721), the Honorable Nicole R. Forzato (ODC File No. C2-24-795), and Jennifer Nash, Esquire (ODC File No. C2-24-861) regarding Respondent's failure to account for fiduciary funds he was holding in his capacity as Executor for the Estate of Doris Jean Boller,

In the Matter of Estate of Doris Jean Boller, Court of Common Pleas of Chester County, Orphans' Court Division, No. 1516-1619 ("Boller Estate matter").

7. On March 28, 2024, Kendal at Longwood, a charitable beneficiary to the Boller Estate, filed a Petition for Filing of Accounting with the Court of Common Pleas of Chester County, requesting that the Court order Respondent to file a formal accounting of the administration in the Boller Estate matter. A true and correct copy of the Petition without exhibits is attached hereto as Exhibit "A".

8. On May 10, 2024, the Pennsylvania Office of Attorney General filed a *Joinder and Answer of the Commonwealth of Pennsylvania, as Parents Patriae, to the Petition for Filing of Account of Kendal at Longwood*, alleging, *inter alia*, that in addition to Kendal at Longwood, McDaniel College, the other charitable beneficiary, did not receive their final distribution despite the fact that Ms. Nash had represented to the Commonwealth on March 22, 2022 that the charities had received their final distribution via checks signed by Respondent. A true and correct copy of the Joinder and Answer without exhibits is attached hereto as Exhibit "B".

9. On June 3, 2024, Respondent failed to appear for a scheduled hearing before the Honorable Nicole R. Forzato, Chester County Court of Common Pleas, to address the Petition for Filing of Accounting.

10. By Order dated June 3, 2024, Judge Forzato:

- a) decreed that the Citation originally dated April 18, 2024 in connection with the Petition for Accounting of the Estate of Doris J. Boller be reissued and served upon Respondent by a Pennsylvania State Constable; and
- b) passed the matter to July 8, 2024.

11. On July 8, 2024, Respondent failed to appear in court despite being served with notice by a Pennsylvania Constable.

12. By Order dated July 8, 2024, Judge Forzato ordered and decreed that:

- a) Respondent shall file the First and Final Accounting of the Boller Estate with the Chester County Register of Wills by close of business on July 29, 2024;
- b) should Respondent fail to file the accounting, a hearing would be held on August 2, 2024 to determine why Respondent should not be held in Contempt of the Court's July 8, 2024 Order; and

- c) “[f]ailure to file the accounting and failure to appear for said hearing may result in sanctions.”

13. Respondent failed to file the First and Final Accounting of the Boller Estate by close of business on July 29, 2024.

14. Respondent failed to appear before the Court on August 2, 2024.

15. By Bench Warrant dated August 2, 2024, Judge Forzato:

- a) ordered law enforcement officers of Chester County to take Respondent into custody for appearance before the Court; and
- b) explained the reason for the issuance of the Bench Warrant was Respondent’s failure to file documentation by July 29, 2024 as required by the July 8, 2024 Court Order.

16. To date, the Bench Warrant dated August 2, 2024 has not been served on Respondent.

17. The Chester County Sheriff’s Office has notified Respondent of the Bench Warrant.

18. To date, Respondent has not turned himself into the Chester County Sheriff’s Office.

19. By DB-7 Request for Statement of Respondent’s Position dated August 28, 2024, ODC placed Respondent on notice of allegations of

misconduct arising from his failure to account for fiduciary funds he was holding on behalf of the Boller Estate. A true and correct copy of the DB-7 dated August 28, 2024 is attached hereto as Exhibit "C".

20. Pursuant to Disciplinary Board Rule § 87.7(b)(2), Respondent was afforded ten (10) days by the Chief Disciplinary Counsel to respond to the DB-7.

21. Pursuant to the authority of Pa.R.D.E. 221(g)(1) and Disciplinary Board Rule § 91.178(b), the DB-7 also contained a request for Respondent to produce to ODC within ten (10) business days the following Records Required to be Maintained Under RPC 1.15(c):

- a) The records of any account, in any financial institutions, including BB&T Account ending in 6559, in which Respondent deposited funds for or behalf of the Estate of Jean Doris Boller for the period August 2016 through and including the present, including but not limited to:
 - i. all transaction records provided to Respondent by the financial institution, such as periodic or monthly statements, cancelled checks front and back in whatever form, deposited items and records of electronic transactions;
 - ii. the check register or separately maintained ledger, which shall include the payee, date, purpose and amount of each check, withdrawal and transfer, the payor, date and

amount of each deposit, and the matter involved for each transaction; and

iii. regular trial balances and monthly reconciliation records for all accounts in which Respondent held funds of the Boller Estate;

- b) Respondent's complete Boller Estate File;
- c) The First and Final Accounting of the Boller Estate; and
- d) All correspondence exchanged between Respondent and all heirs, beneficiaries, and third persons in connection with the Boller Estate.

22. On Wednesday, August 28, 2024 at 4:44 p.m., ODC Investigator/Auditor Esther J. Thomas personally served Respondent at his home in the state of Delaware with the DB-7 and Demand for RPC 1.15(c) records as set forth in her notarized Affidavit of Service, a true and correct copy of which is attached hereto as ODC Exhibit "D".

23. To date, Respondent has failed to respond in any manner to ODC.

24. To date, Respondent has failed to provide his Statement of Position to the DB-7 and has not provided ODC with an explanation why he has not provided his Statement of Position.

25. To date, Respondent has failed to produce to ODC any of the RPC 1.15(c) requested documents listed in the August 28, 2024 letter that he was directed to provide to ODC.

26. It is believed and therefore averred that Respondent has failed to maintain the Boller Estate records as required by RPC 1.15.

27. On or about September 10, 2024. ODC received records relating to the "Est of Estate of Doris Boller, EXC Michael Sangemino" account from Truist Financial (formerly BB&T) in response to a subpoena. A preliminary review of the records indicates a balance of \$1.38 as of August 5, 2024, and that from November 2019 to February 2023 Respondent issued multiple checks payable to himself totaling \$196,240.00.

28. Based on the forgoing, it appears that Respondent has ignored his obligation to safeguard entrusted funds and possibly misappropriated and/or converted fiduciary funds belonging to the Boller Estate.

29. Respondent's wholesale failure to produce any records he is required to maintain and produce to ODC in compliance with RPC 1.15(c) and subdivisions (e) and (g) of Disciplinary Enforcement Rule 221 further warrants his temporary suspension.

30. Respondent's disregard of the Rules of Professional Conduct and Disciplinary Enforcement Rules regarding safekeeping funds warrants the issuance of a rule to show cause why he should not be placed on temporary suspension.

31. ODC believes and therefore avers that Respondent's conduct potentially violates RPC 1.3; RPC 1.15(b); RPC 1.15(e); RPC 4.1(a); RPC 8.4(b); RPC 8.4(c); RPC 8.4(d); Pa.R.D.E. 203(b)(3); Pa.R.D.E. 203(b)(7); Pa.R.D.E. 221(c); Pa.R.D.E. 221(g)(2); Pa.R.D.E. 221(g)(3); and D.Bd. Rule 87.7(e).

WHEREFORE, ODC respectfully requests that the Disciplinary Board issue a Rule upon Respondent to show cause, if he has any, within ten (10) days following service of the Rule as to why he should not be temporarily suspended.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL
Thomas J. Farrell, Esquire
Chief Disciplinary Counsel

By:



Emily R. Provencher
Disciplinary Counsel
Attorney Registration Number 309804
District II Office
820 Adams Avenue, Suite 170
Trooper, PA 19403
(610) 650-8210

BEFORE THE DISCIPLINARY BOARD
OF THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. DB 2024
Petitioner :
: ODC File Nos. C2-24-721;
v. : C2-24-795;
: C2-24-861
: :
: Attorney Reg. No. 85285
MICHAEL J. SANGEMINO, :
Respondent : (Chester County)

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a copy of the Petition For
Issuance Of a Rule To Show Cause Why Respondent Should Not Be Placed
on Temporary Suspension Pursuant to Pa.R.D.E. 208(f)(5) and all
accompanying documents upon the person and in the manner indicated
below, which service satisfies the requirements of Pa.R.A.P. 121.

First Class Mail, Certified Mail, Email, and Attempted Personal Service

Michael J. Sangemino, Esquire
224 East Street Road Ste B2E
Kennett Square, Pennsylvania 19348-1705
msangemino@gmail.com

Date: September 16, 2024

Emily R. Provencher

Emily R. Provencher
Disciplinary Counsel
Attorney Registration Number 309804
Office of Disciplinary Counsel
820 Adams Avenue, Suite 170
Trooper, PA 19403

VERIFICATION

The statements contained in the foregoing Petition For Issuance Of A Rule To Show Cause Why Respondent Should Not Be Placed on Temporary Suspension Pursuant To Pa.R.D.E. 208(f)(5) 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.A. §4904, relating to unsworn falsification to authorities.

September 16, 2024

Date



Emily R. Provencher
Disciplinary Counsel
District II Office

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Office of Disciplinary Counsel

Signature: Emily Provencher

Name: Emily R. Provencher

Attorney Number: # 309804

LARMORE SCARLETT LLP

BY: L. Peter Temple, Esquire
P. O. Box 384
Kennett Square, PA 19348
(610) 444-3737
(610) 444-9532 (fax)
peter@larmorescarlett.com

Attorneys for: Petitioner
Attorney I.D. No. 17573

**COURT OF COMMON PLEAS OF
CHESTER COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION**

IN THE MATTER OF:

ESTATE OF DORIS JEAN BOLLER

IN THE COURT OF COMMON PLEAS
CHESTER COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION

NO: 1516-1619

PRELIMINARY DECREE and CITATION

AND NOW, this _____ day of _____, 2024, upon consideration of the foregoing Petition for Accounting of the Estate of Doris Jean Boller, Deceased, and on motion of L. Peter Temple, Esquire, it is hereby ORDERED and DECREED that a citation be issued to show cause why Michael Sangemino, Executor of the Estate of Doris Jean Boller, should not be directed to immediately file a formal court accounting in this estate.

A hearing on the Petition for Filing of Accounting shall be held on the _____ day of _____, 2024, _____ am/pm prevailing time, in Courtroom _____ of the Chester County Justice Center, West Chester, Pennsylvania.

EXHIBIT A

LIST OF PERSONS TO WHOM NOTICE IS TO BE GIVEN:

Michael Sangemino, Executor
c/o Jennifer Nash, Esquire
jennifernashlawinc@gmail.com

Janet E. Heins
1124 Midvale Road
Kensington, MD 20895

John R. Boller
678 Discovery Court
Davidsonville, MD 21035

McDaniel College
2 College Hill
Westminster, MD 21157

Kendal at Longwood
P. O. Box 100
Kennett Square, PA 19348

By the Court:

LARMORE SCARLETT LLP
BY: L. Peter Temple, Esquire
P. O. Box 384
Kennett Square, PA 19348
(610) 444-3737
(610) 444-9532 (fax)
peter@larmorescarlett.com

Attorneys for: Petitioner
Attorney I.D. No. 17573

FILED

MAR 28 2024

**Clerk of Orphans' Court
Chester County, PA**

**COURT OF COMMON PLEAS OF
CHESTER COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION**

IN THE MATTER OF:
ESTATE OF DORIS JEAN BOLLER

IN THE COURT OF COMMON PLEAS
CHESTER COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION

NO: 1516-1619

PETITION FOR FILING OF ACCOUNTING

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Petitioner, Kendal at Longwood, by and through their attorney, L. Peter Temple, Esquire, and pursuant to 20 P.S. §3501.1, respectfully represents that:

1. Petitioner is a 501(c)(3) tax-exempt organization, EIN 23-1906212, and is a residuary beneficiary of the Estate of Doris Jean Boller.
2. Doris Jean Boller (“Decedent”), passed away testate on August 28, 2016, at the age of 87 and with an address of 440 Kendal Drive, Kennett Square, Pennsylvania 19348. A copy of the probated will of Doris Jean Boller is attached as Exhibit A.
3. Letters testamentary were first granted in the Decedent’s estate in the Chester County Register of Wills on September 7, 2016, to Michael Sangemino, Esquire. The Chester County Register of Wills file number is 1516-1619.
4. The Decedent’s Will designated four residuary beneficiaries of her estate: 25% of the residue to her sister, Janet E. Heins, 25% of the residue to her brother, John R. Boller, 25% of the residue to McDaniel College, a 501(c)(3) tax-exempt organization, and 25% of the residue to Kendal at Longwood, a 501(c)(3) tax-exempt organization.
5. Janet E. Heins resides at 11224 Midvale Road, Kensington, Maryland 20895.

6. John R. Boller resides at 678 Discovery Court, Davidsonville, Maryland 21035.
7. McDaniel College has an address of 2 College Hill, Westminster, Maryland 21157.
8. Kendal at Longwood has an address of P. O. Box 100, Kennett Square, Pennsylvania 19348.
9. Correspondence from estate counsel, Jennifer Nash, dated April 25, 2018 to Kendal at Longwood advised that $\frac{3}{4}$ of the assets would be distributed in the next several months, and the balance would be held “as a reserve pending clearance of the estate by the taxing authorities and will be used to pay any additional expenses, debts, fees, and other taxes of the estate pending final distribution”.
10. In fact, a settlement agreement for the Doris Jean Boller Estate of an interim nature was prepared and executed by my client on or about April 25, 2018, said agreement is attached as Exhibit B.
11. An interim account of the Estate of Doris Jean Boller, deceased, is attached as Exhibit C. This interim account makes clear that the distribution was \$600,000, and that approximately \$200,000 was to be held back until all clearances were received as set forth in Jennifer Nash’s letter of April 25, 2018.
12. A schedule of distribution was prepared by Michael Sangemino dated April 25, 2018, which is attached as Exhibit D. This schedule again sets forth that the amount of \$150,000 was an interim distribution subject of course to final distribution at a later date.
13. Petitioner received an interim distribution of their 25% bequest from the residue of the Doris Jean Boller Estate on approximately June 4, 2018, in the amount of \$150,000.
14. To date, Petitioner has not received the full and final distribution of their 25% bequest from the residue of the Doris Jean Boller Estate, nor has Petitioner signed a Receipt, Release, and Indemnification evidencing their receipt of this distribution.
15. More than seven years have elapsed since Michael Sangemino was appointed as Executor of the Estate of Doris Jean Boller.
16. The undersigned has twice contacted Michael Sangemino to discuss this situation. Mr. Sangemino was unable to participate in either of those conference calls for unspecified reasons.
17. 20 Pa. Cons. Stat. §3501.1 provides that a personal representative may be cited to file an account six months after the advertisement of the original grant of letters.

18. As a residuary beneficiary of the estate, Petitioner respectfully requests that Executor Michael Sangemino file a formal accounting.

WHEREFORE, Petitioner respectfully requests this Honorable Court order Michael Sangemino, Executor, to file a formal accounting of the administration of the Estate of Doris Jean Boller pursuant to 20 Pa. Cons. Stat. §3501.1.

Respectfully submitted,

LARMORE SCARLETT LLP

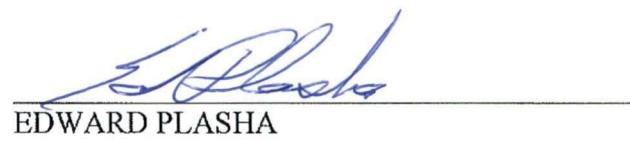


L. Peter Temple, Esquire

Dated: 3/28/2024

VERIFICATION

I, EDWARD PLASHA, verify that I am a duly authorized agent and representative of the Petitioner named in the foregoing Petition and that the facts set forth therein are true and correct, to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa Con. Stat. §4904 relating to unsworn falsification to authorities.



EDWARD PLASHA

IN THE COURT OF COMMON PLEAS OF CHESTER COUNTY
ORPHANS' COURT DIVISION

FILED

ESTATE OF DORIS JEAN BOLLER, Deceased

MAY 10 2024

O.C. NO. 1516-1619

Clerk of Orphans' Court
Chester County, PA

**JOINDER AND ANSWER OF THE COMMONWEALTH OF PENNSYLVANIA,
AS PARENTS PATRIAEE, TO THE PETITION FOR FILING OF ACCOUNT OF
KENDAL AT LONGWOOD**

TO THE HONORABLE, THE JUDGES OF THE SAID COURT:

The Commonwealth of Pennsylvania, Office of Attorney General, as *parens patriae*, ("Commonwealth") hereby joins the Petition for Filing of Account filed by Kendal at Longwood ("Kendal") and answers the Petition as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. The Commonwealth is without knowledge as to the correspondence between Nash and Kendal.
10. Admitted.
11. Admitted.

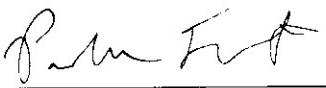
EXHIBIT B

12. Admitted.
13. Admitted.
14. Admitted. By way of further answer, it has come to the Commonwealth's attention that in addition to Kendal, McDaniel College, the other charitable beneficiary, did not receive their final distribution. This is despite the fact that it was represented to the Commonwealth by Nash on March 22, 2022 that the charities received their final distributions via checks signed by the executor, Michael Sangemino, Esquire ("Sangemino"). The Commonwealth received copies of the checks via email on that same date. Additionally, copies of the cancelled checks were emailed to the Commonwealth on December 12, 2022. The copies of the cancelled estate checks are attached as Exhibit "A".
15. Admitted.
16. The Commonwealth is without knowledge as to how many times the undersigned contacted Sangemino.
17. No answer is required as 20 Pa. Const. Stat. §3501.1 speaks for itself.
18. The Commonwealth joins in the request contained herein.

WHEREFORE, the Commonwealth joins in Kendal at Longwood's request that this Honorable Court order Michael Sangemino, to file a formal accounting of the administration of the Estate of Doris Jean Boller, pursuant to 20 Pa. Cons. Stat. §3501.1.

FOR THE COMMONWEALTH:
Michelle A. Henry
Attorney General

By:


Pamela S. Fingerhut
Senior Deputy Attorney General
Attorney ID No. 84079
Office of Attorney General
Charitable Trusts and
Organizations Section
1600 Arch Street, Suite 300
Philadelphia, PA 19103
(215) 560-2757

Date: May 10, 202



The
DISCIPLINARY BOARD
of the Supreme Court of Pennsylvania

Your Pennsylvania Bar License Is at Risk.

Take Action. The Office of Disciplinary Counsel of the Pennsylvania Disciplinary Board has opened an investigation into potential ethical violations that you may have committed.

Disbarment Is a Real Risk. Over 30 Pennsylvania attorneys are disbarred every year, and even more are suspended from the practice of law. Even if this case does not seem substantial, an adverse finding can be used against you in a future case, increasing your chances of severe discipline.

Reduce Your Risk. Share your side of the story and mitigation evidence. Early intervention can also minimize the costs of the discipline process. Failure to respond appropriately to a disciplinary investigation can itself be grounds for discipline.

Do Not Assume You Can Handle This Yourself. Professional discipline is a complex area of practice, with its own rules of procedure. Experienced counsel can help you navigate the process, provide an objective evaluation, and negotiate a favorable resolution.

Representation Can Help. The Office of Disciplinary Counsel has found that attorneys who are not represented during the discipline process are at risk for more severe discipline as compared with attorneys who are represented by counsel.

Attorneys Are Available to Help You. In Pennsylvania there is a robust group of attorneys who specialize in professional discipline cases. Contact your local bar association for referral information. Your professional liability insurance may cover some of the cost of representation.

Thomas J. Farrell
Chief Disciplinary Counsel

Raymond S. Wierciszewski
Deputy Chief Disciplinary Counsel

District II Office
820 Adams Avenue
Suite 170
Trooper, PA 19403
(610) 650-8210
Fax: (610) 650-8213

Harold E. Ciampoli, Jr.
Disciplinary Counsel-in-Charge

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



Disciplinary Counsel
Elizabeth A. Livingston
Marie C. Dooley
Mark F. Gilson
Jennifer Flemister
Emily R. Provencher

OFFICE OF DISCIPLINARY COUNSEL
www.padisciplinaryboard.org

August 28, 2024

PERSONAL AND CONFIDENTIAL

Michael J. Sangemino, Esquire
224 East Street Road Ste B2E
Kennett Square, Pennsylvania 19348-1705
msangemino@gmail.com

Re: Complaints of Senior Deputy Attorney General Pamela S. Fingerhut
File No. C2-24-721

The Honorable Nicole R. Forzato
File No. C2-24-795

**DB-7 REQUEST FOR STATEMENT OF RESPONDENT'S POSITION AND
DEMAND FOR REQUIRED RECORDS PURSUANT TO Pa.R.D.E 221(g)(2)
& D.Bd. Rule 87.7(e)**

Dear Mr. Sangemino:

Please be advised that this office has received and is currently considering a complaint against you from Senior Deputy Attorney General Pamala S. Fingerhut and the Honorable Nicole R. Forzato, Chester County Court of Common Pleas. It is important for you to understand that issuance of this letter means that the complaint has survived this office's initial screening process and that, based upon the information currently available to us, it appears that your alleged conduct may have violated the Pennsylvania Rules of Professional Conduct ("RPC").

It is also important for you to understand that it is the obligation of our office to develop all information relevant to a complaint, including that information which may justify or exonerate the alleged actions of the respondent-attorney or mitigate the seriousness of any violations that may have

occurred. Since this complaint has survived our initial screening process, you should retain or consult with counsel before submitting a statement of your position.

IT IS IMPORTANT THAT YOU READ THIS DB-7 LETTER IN ITS ENTIRETY. IT CONTAINS A RECITATION OF THE ALLEGED FACTS UNDER CONSIDERATION AND A REQUEST FOR RECORDS THAT YOU ARE REQUIRED TO MAINTAIN UNDER RPC 1.15(c), Pa.R.D.E. 221(e) AND D.Bd.RULE § 91.177(a).

DEMAND FOR REQUIRED RECORDS

WHETHER OR NOT YOU SUBMIT A SUBSTANTIVE RESPONSE TO THE BELOW ALLEGATIONS OF MISCONDUCT, YOU ARE DIRECTED TO PROVIDE TO THIS OFFICE, PURSUANT TO Pa.R.D.E. 221(g)(2) AND D.Bd.RULE §87.7(e), THE FOLLOWING DOCUMENTS AND INFORMATION WITHIN TEN (10) BUSINESS DAYS OF RECEIPT OF THIS DB-7 LETTER:

- 1. The records of any account, in any financial institutions, including BB&T Account ending in 6559, in which you deposited funds for or behalf of the Estate of Jean Doris Boller for the period August 2016 through and including the present, including but not limited to:**
 - a. all transaction records provided to you by the financial institution, such as periodic or monthly statements, cancelled checks front and back in whatever form, deposited items and records of electronic transactions;**
 - b. the check register or separately maintained ledger, which shall include the payee, date, purpose and amount of each check, withdrawal and transfer, the payor, date and amount of each deposit, and the matter involved for each transaction; and**
 - c. regular trial balances and monthly reconciliation records for all accounts in which you held funds of the Boller Estate.**
- 2. Your complete Boller Estate File.**
- 3. The First and Final Accounting of the Boller Estate.**
- 4. All correspondence exchanged between you and all heirs, beneficiaries, and third persons in connection with the Boller Estate.**

PURSUANT TO Pa.R.D.E. 221(g)(2) AND D.Bd.RULE §87.7(e), YOU MUST PRODUCE THE SPECIFIED RECORDS WITHIN TEN (10) BUSINESS DAYS OF THE RECEIPT OF THIS DB-7 LETTER WHETHER OR NOT YOU FILE A STATEMENT OF POSITION TO THE SUBSTANTIVE ALLEGATIONS CONTAINED IN THE DB-7 LETTER.

THIS DB-7 LETTER WILL BE CONSIDERED "RECEIVED" WHEN:

- (A) PERSONAL SERVICE IS ACCOMPLISHED OR**
- (B) A COPY OF THIS DB-7 LETTER IS DELIVERED TO AN EMPLOYEE, AGENT, OR OTHER RESPONSIBLE PERSON AT YOUR OFFICE AS DETERMINED BY THE ADDRESS FURNISHED BY YOU ON YOUR MOST RECENTLY FILED ATTORNEY REGISTRATION STATEMENT, OR**
- (C) IF MAILED BY CERTIFIED MAIL WITH RETURN RECEIPT REQUESTED TO ONE OR MORE OF THE ADDRESSES FURNISHED BY YOU IN YOUR LAST ATTORNEY REGISTRATION STATEMENT AND DELIVERY IS ACCEPTED AS SHOWN BY ELECTRONIC OR PAPER RETURN RECEIPT CONTAINING THE NAME OR OTHER PERSON WHO ACCEPTED DELIVERY.**

PURSUANT TO Pa.R.D.E. 221(g)(3), AND D.Bd.RULES §87.7(f) AND §91.179, YOUR FAILURE TO PRODUCE THE SPECIFIED RECORDS WITHIN TEN (10) BUSINESS DAYS FROM RECEIPT OF THIS DB-7 LETTER MAY RESULT IN THE INITIATION OF PROCEEDINGS TO HAVE YOU PLACED ON EMERGENCY TEMPORARY SUSPENSION PURSUANT TO Pa.R.D.E. 208(f)(1) OR Pa.R.D.E. 208(f)(5).

DB-7 REQUEST FOR STATEMENT OF RESPONDENT'S POSITION

The alleged facts presently under consideration are as follows:

1. Doris Jean Boller passed away testate on August 28, 2016, at the age of 87 and with an address of 440 Kendal Drive, Kennett Square, Pennsylvania, 19348.
2. Ms. Boller executed a Will on December 4, 2008.
3. Ms. Boller's Will designated four residuary beneficiaries of her estate:
 - a. Twenty-five percent (25%) of the residue to her sister, Janet E. Heins;

- b. Twenty-five percent (25%) of the residue to her brother, John R. Boller;
 - c. Twenty-five percent (25%) of the residue to McDaniel College, a 501(c)(3) tax-exempt organization, to be added to its endowment fund; and
 - d. Twenty-five percent (25%) of the residue to Kendal at Longwood, a 501(c)(3) tax-exempt organization where Ms. Boller resided, to be used for its general purposes.
4. Ms. Boller appointed Mark H. Froehlich, Esquire, to be her Executor.
5. If Mr. Froehlich failed to qualify for any reason as her Executor, or having qualified should die, resign, or cease to act for any reason as her Executor, Ms. Boller appointed you as her Executor.
6. Mr. Froehlich passed away on September 27, 2015, prior to Ms. Boller's passing.
7. On September 7, 2016, you were granted Letters Testamentary for the Estate of Doris Jean Boller in the Chester County Register of Wills, *In the Matter of: Estate of Doris Jean Boller*, No. 1516-1619 ("Boller Estate matter").
8. From August 2016 through the present, you have acted as a Fiduciary of the Boller Estate.
9. In your capacity as a Fiduciary, you received and held funds belonging to the Boller Estate.
10. By letter dated April 25, 2018, from estate counsel, Jennifer Nash, Esquire, to Kendal at Longwood, it was represented that three-fourths of the assets would be distributed in the next several months, and the balance would be held "as a reserve pending clearance of the estate by the taxing authorities and will be used to pay any additional expenses, debts, fees, and other taxes of the estate pending final distribution."
11. On or about April 25, 2018, you entered into a Settlement Agreement as Executor for the Boller Estate with John R. Boller, Janet E. Heins, McDaniel College, and Kendal at Longwood ("Beneficiaries").
12. You signed the Settlement Agreement on April 25, 2018.
13. You prepared a Schedule of Distribution as part of the Settlement Agreement.

14. The Schedule of Distribution represented:
 - a. the combined balance of the Estate, in the hands of the Executor, was valued at \$802,529.10;
 - b. that each beneficiary would receive a distribution of \$150,000.00 (\$600,000.00 total);
 - c. that you proposed to hold \$202,529.10 as a reserve, which was to be maintained for the purposes of providing for the payments of any additional expenses, fees, attorneys fees, commissions, taxes and/or other liabilities that were due payable with regard to the administration of the Estate; and
 - d. that you were to provide the beneficiaries with an Informal Final Account of the Estate and distribute the remainder of the reserve with any increases or decreases thereto once all other expenses and/or fees were finalized.
15. You signed the Schedule of Distribution on April 25, 2018.
16. On or about June 4, 2018, the Beneficiaries each received an interim distribution in the amount of \$150,000.00 of their 25% bequest from the residue of the Boller Estate.
17. To date, you have failed to provide the beneficiaries with an Informal Final Account of the Estate as required by the Schedule of Distribution that you prepared and signed on April 25, 2018.
18. To date, you have failed to distribute the remainder of the reserve with any increases or decrease thereto as required by the Schedule of Distribution that you prepared and signed on April 25, 2018.
19. On March 22, 2022, Ms. Nash:
 - a. represented to the Pennsylvania Office of Attorney General that the charities had received from the Boller Estate their respective final distribution of \$49,479.55; and
 - b. provided the Pennsylvania Office of Attorney General via email copies of checks #166 and #167 dated March 22, 2022 and signed by you, drawn on the BB&T Account of Doris Boller, EXC Michael J. Sangemino, payable to

McDaniel College and Kendal at Longwood, respectively, in the amount of \$49,479.52.

20. On December 12, 2022, Ms. Nash provided the Pennsylvania Office of Attorney General via email copies of purported cancelled checks #166 and #167.
21. As of August 2024, the only distributions each of the Beneficiaries had received from the Boller Estate were the interim distributions made on June 4, 2018 as described in ¶ 16, *supra*.
22. It is believed and averred that the Beneficiaries were never provided, nor did they receive the March 22, 2022 estate checks purportedly issued and signed by you.
23. On March 28, 2024, through its attorney L. Peter Temple, Esquire, Kendal at Longwood, filed a Petition for Filing of Accounting with the Chester County Court of Common Pleas, requesting that the Court order you to file a formal accounting of the administration in the Boller Estate matter.
24. On or about April 5, 2024 you filed your Entry of Appearance in the Boller Estate matter, in addition to your role as Executor in the case.
25. On or about April 9, 2024, Ms. Nash withdrew from the case as your counsel for the Boller Estate matter.
26. On April 18, 2024, a Citation was issued by the Chester County Clerk of the Orphans' Court, directing you to file a complete answer under oath to the averments of the Petition for Filing of Accounting in the Doris Boller matter, and show cause why relief sought in the Petition should not be granted.
27. You received notice of the April 18, 2024 Citation.
28. On or about April 18, 2024, the Court scheduled the Call of the Orphans' Court Contested List on June 3, 2024 at 9:30 A.M. before the Honorable Nicole R. Forzato, Chester County Court of Common Pleas, to address the Petition for Filing of Accounting.
29. You received notice of the June 3, 2024 Call of the Contested List.
30. On May 10, 2024, the Pennsylvania Office of Attorney General filed a Joinder and Answer of the Commonwealth of Pennsylvania, as Parents Patriae, to the Petition for Filing of Account of Kendal at Longwood, alleging, *inter alia*, that in addition to

Kendal at Longwood, McDaniel College, the other charitable beneficiary, did not receive their final distribution despite the fact that Ms. Nash had represented to the Commonwealth on March 22, 2022 that the charities had received their final distribution via checks signed by you.

31. You failed to appear before the Court on June 3, 2024 for the Call of the Contested List.
32. By Order dated June 3, 2024, the Court:
 - a. ordered and decreed that the Citation originally dated April 18, 2024 in connection with the Petition for Accounting of the Estate of Doris J. Boller be reissued and served upon you by a Pennsylvania State Constable; and
 - b. passed the matter to the Call of the Contested List on July 8, 2024 at 9:30 A.M.
33. You received notice of the Court's June 3, 2024 Order.
34. You failed to appear in Court for the Call of the Contested List held on July 8, 2024, despite being served with notice by a Pennsylvania Constable.
35. By Order dated July 8, 2024, the Court ordered and decreed that:
 - a. you shall file the First and Final Accounting of the Boller Estate with the Chester County Register of Wills by close of business on July 29, 2024;
 - b. should you fail to file the accounting, a hearing would be held on August 2, 2024 at 1:30 P.M. to determine why you should not be held in Contempt of the Court's July 8, 2024 Order; and
 - c. “[f]ailure to file the accounting and failure to appear for said hearing may result in sanctions.”
36. On July 19, 2024, Constable William Corozzo served you at your law firm in Kennett Square, Pennsylvania with the Court's July 8, 2024 Order.
37. You also received notice of the Court's July 8, 2024 Order when it was sent certified mail to your home address in Delaware.
38. You failed to file the First and Final Accounting of the Boller Estate by close of

business on July 29, 2024.

39. You failed to appear before the Court on August 2, 2024.
40. By Bench Warrant dated August 2, 2024, Judge Forzato:
 - a. ordered law enforcement officers of Chester County to take you into custody for appearance before the Court; and
 - b. explained the reason for the issuance of the Bench Warrant was your failure to file documentation by July 29, 2024 as required by the July 8, 2024 Court Order.
41. More than seven years have elapsed since you were appointed as Executor of the Estate of Doris Jean Boller.
42. The Beneficiaries have not received the full and final distribution of their 25% bequest from the residue of the Doris Jean Boller Estate.
43. To date, you have failed to distribute the remaining assets of the Estate of Doris Jean Boller to its Beneficiaries.
44. To date, you have failed to provide any explanation as to why there has been no final distribution even though copies of checks, that appeared to be the final distribution, were supplied to the Pennsylvania Office of Attorney General in 2022.
45. To date, you have failed to respond to inquiries by the Beneficiaries or their attorneys regarding additional distributions owed.
46. You failed to provide any explanation or proof as to the reserve that you have maintained since 2018, which was to be used for the payments of any additional expenses, fees, attorneys fees, commissions, taxes and/or other liabilities that were due payable with regard to the administration of the Estate.
47. It is believed and averred that \$202,529.10 of the Boller Estate has not been distributed.
48. It is believed and averred that you misappropriated fiduciary funds and converted those funds belonging to the Boller Estate for your own use.

If the above allegations are true, we are concerned that you may have violated the following Rules of Professional Conduct: RPC 1.3; RPC 1.15(b); RPC 1.15(e); RPC 4.1(a); RPC 8.4(b); RPC 8.4(c); and RPC 8.4(d).

The Office of Disciplinary Counsel will make no recommendation for the disposition of these complaints until you have been afforded an opportunity to state your position with respect thereto within ten (10) days of the date of this letter. This response time has been fixed by Chief Disciplinary Counsel pursuant to Disciplinary Board Rules § 87.7(b)(2). Please note that failure to respond to this request for your statement of position without good cause is an independent ground for discipline pursuant to Rule 203(b)(7) of the Pennsylvania Rules of Disciplinary Enforcement. The Office of Disciplinary Counsel will only agree to a limited extension of the ten-day deadline when the request is made for specific reasons constituting good cause. If you do not respond or provide good cause for failing to respond within ten (10) days, the Office of Disciplinary Counsel may seek to impose discipline for your violation of Pa.R.D.E. 203(b)(7).

Please be assured that we are not prejudging the alleged facts and charges nor are we an advocate on behalf of the complainant. Rather, we are conducting an impartial and unbiased investigation concerning this complaint. In that regard, we will attempt to verify the statements in your answer just as we do with the statements made to us by the complainant. For this reason, and because a lawyer can be subject to discipline for making a materially false statement or deliberately failing to disclose a material fact in connection with a disciplinary matter, you should be careful to be accurate in your factual statements. Additionally, as previously stated, you may wish to consult with counsel before replying to the allegations.

In any reply that you make, please chronologically and specifically state your account of the events and include copies of any particularly pertinent documents to which you refer. Generally, it is most helpful if your response deals item-by-item with the allegations contained in the numbered paragraphs in this letter, as well as with the cited Rules.

Please be advised that §85.13 of the Disciplinary Board Rules requires that any response to this letter:

...that contains an averment of fact not appearing of record or a denial of fact shall include or be accompanied by a verified statement signed by the respondent-attorney that the averment or denial is true based upon knowledge or information and belief. The respondent-attorney need not aver the source of the information or expectation of ability to prove the averment or denial. The verified statement may be based upon personal knowledge as to a part and upon information and belief as to the remainder.

Michael J. Sangemino, Esquire
August 28, 2024
Page 10

If we do not hear from you within ten (10) days, we may assume that you do not desire to submit your position with respect to this complaint and that we can proceed to make our recommendation for an appropriate disposition on the basis of the information and material contained in our file, including your failure to respond in violation of Pa.R.D.E. 203(b)(7). However, we would certainly prefer to have the benefit of your position before making our recommendation.

Keep in mind that we may provide the complainant with a copy of your statement of position or a summary of it for the express purpose of obtaining a replication, unless you request that the content of your answer, either in total or in part, not be revealed and state reasons therefore which represent good cause. If we do provide the complainant with a copy or summary of your position, we will remind the complainant of the confidentiality of our inquiry.

If you have any questions, you or your counsel should not hesitate to contact this office. Thank you for your anticipated cooperation and assistance in this important matter. We look forward to receiving your response.

Very truly yours,
OFFICE OF DISCIPLINARY COUNSEL

Emily R. Provencher

Emily R. Provencher
Disciplinary Counsel
District II Office

ERP: mc

VIA PERSONAL SERVICE,
FIRST CLASS MAIL AND EMAIL

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :	No. C2-24-721 and C2-24-795
v. :	Attorney Reg. No. 085285
MICHAEL J. SANGEMINO Respondent :	Chester County

AFFIDAVIT OF SERVICE

I, Esther J. Thomas, Auditor Investigator, Office of Disciplinary Counsel, 820 Adams Avenue, Trooper, Pennsylvania, being duly sworn according to law, depose and say that, on Wednesday, August 28, 2024, I served on Respondent Form DB-7, *Request for Statement of Respondent's Position and Demand for Required Records Pursuant to Pa.R.D.E. 221(g)(2) & D.Bd. Rule 87.7(e)*, at 4:44 pm, at 7 Elm Avenue, Newark, DE 19711, dated August 28, 2024, filed with the Supreme Court/ Disciplinary Board of the Supreme Court of Pennsylvania.

Esther J. Thomas

Auditor/Investigator

Sworn to and subscribed
before me this 4th day
of September, 2024.

EXHIBIT D

Meghan A. Cagliola
Notary Public

Commonwealth of Pennsylvania - Notary Seal
Meghan A. Cagliola, Notary Public
Montgomery County
My commission expires February 4, 2027
Commission number 1288135
Member, Pennsylvania Association of Notaries

Attachment B

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF: Chester

Magisterial District Number: 15-1-01
MDJ: Hon. Judge Mark C. Lieberman
Address: 201 W. Market St., Suite 1307
West Chester, PA 19380
Telephone: (610) 455-1169



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

Michael Joseph Sangemino
First Name Middle Name Last Name Gen.
7 Elm Avenue
Newark, DE 19711

NCIC Extradition Code Type

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

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-132-25	Date Filed 06/24/25	OTN/LiveScan Number T1012895-2	Complaint Number	Incident Number CC-24-01646	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male	DOB 08/03/ 1966	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>	Gen.
<input type="checkbox"/> Female	First Name	Middle Name	Last Name		
AKA					
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 type="checkbox"/> BRO (Brown)
<input checked="" type="checkbox"/> BLK (Black)	<input type="checkbox"/> ONG (Orange)	<input type="checkbox"/> WHI (White)	<input type="checkbox"/> XXX (Unk./Bald)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> PNK (Pink)
<input type="checkbox"/> BLN (Blonde / Strawberry)					
EYE COLOR <input type="checkbox"/> BLK (Black)	<input type="checkbox"/> BLU (Blue)	<input checked="" type="checkbox"/> BRO (Brown)	<input type="checkbox"/> GRN (Green)	<input type="checkbox"/> GRY (Gray)	
<input type="checkbox"/> HAZ (Hazel)	<input type="checkbox"/> MAR (Maroon)	<input type="checkbox"/> PNK (Pink)	<input type="checkbox"/> MUL (Multicolored)	<input type="checkbox"/> XXX (Unknown)	
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location				WEIGHT (lbs.)
FBI Number	MNU Number				130
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					Ft. HEIGHT In.
Fingerprint Classification:					5 03

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 that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

Mr. Ronald Yen

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

6/24/25
(Date)

I, Det. Thomas J. Goggin
(Name of the Affiant)

11852 MPOETC

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

of Chester County Detectives, Pennsylvania

PA0154500

DISTRICT COURT

(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

(Police Agency ORI Number)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____

JUN 24 2025

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have
therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [414] West Chester Borough

(Subdivision Code) (Place-Political Subdivision)
201 W. Market Street West Chester Borough; 933 S. High Street West Chester; 7 Great Valley Pkwy Malvern PA.

in Chester County [15] on or about November 12, 2019 to February 16, 2023.
(County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint Number	Incident Number CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

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.)

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 _____
------------------	--	---	---	---

Lead? <input checked="" type="checkbox"/>	Offense# 1	Section 3927	Subsection a	PA Statute (Title) of the 18	Counts 1	Grade F2		UCR/NIBRS Code 120/
---	------------	--------------	--------------	------------------------------	----------	----------	--	---------------------

PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	--	-------------------------------------	--	--------------------------------------	--	------------------------------------

Statute Description (include the name of statute or ordinance):

Theft by Failure to Make Required Disposition of Funds .

Acts of the accused associated with this Offense:

September 1, 2020 to september 1, 2021: \$127,500.

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 _____
------------------	--	---	---	---

Lead? <input type="checkbox"/>	Offense# 2	Section 3921	Subsection a	PA Statute (Title) of the 18	Counts 1	Grade F2		UCR/NIBRS Code 060/
--------------------------------	------------	--------------	--------------	------------------------------	----------	----------	--	---------------------

PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	--	-------------------------------------	--	--------------------------------------	--	------------------------------------

Statute Description (include the name of statute or ordinance):

Theft by Unlawful Taking or Disposition.

Acts of the accused associated with this Offense:

September 1, 2020 to September 1, 2021: \$127,500.

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 _____
------------------	--	---	---	---

Lead? <input type="checkbox"/>	Offense# 3	Section 3925	Subsection of the	PA Statute (Title) 18	Counts 1	Grade F2		UCR/NIBRS Code 130
--------------------------------	------------	--------------	-------------------	-----------------------	----------	----------	--	--------------------

PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone
------------------------------	-----------------	--	--	-------------------------------------	--	--------------------------------------	--	------------------------------------

Statute Description (include the name of statute or ordinance):

Receiving Stolen Property

Acts of the accused associated with this Offense:

September 1, 2020 to September 1, 2021: \$127,500.



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint Number	Incident Number CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

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.)

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Dealing in Proceeds of Unlawful Activities.							
Acts of the accused associated with this Offense: September 1, 2020 to September 1, 2021.							

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Dealing in Proceeds of Unlawful Activities.							
Acts of the accused associated with this Offense: September 1, 2020 to September 1, 2021.							

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Theft by Failure to Make Required Disposition of Funds.							
Acts of the accused associated with this Offense: April 28, 2022 to July 27, 2022: \$46,500.00							



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint Number	Incident Number CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

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.)

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Theft by Unlawful Taking or Disposition.							
Acts of the accused associated with this Offense: April 18, 2022 to July 27, 2022: \$46,500.							

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Receiving Stolen Property.							
Acts of the accused associated with this Offense: April 18, 2022 to July 27, 2022: \$46,500.							

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Dealing in Proceeds of Unlawful Activities.							
Acts of the accused associated with this Offense: April 18, 2022 to July 17, 2022.							



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint Number	Incident Number CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

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.)

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 _____				
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number	<input type="checkbox"/> Interstate			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Dealing in Proceeds of Unlawful Activities.								
Acts of the accused associated with this Offense: April 18, 2022 to July 27, 2022.								

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 _____				
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number	<input type="checkbox"/> Interstate			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Forgery.								
Acts of the accused associated with this Offense: In or about December, 2022.								

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 _____				
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number	<input type="checkbox"/> Interstate			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Forgery.								
Acts of the accused associated with this Offense: In or about December, 2022.								



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint Number	Incident Number
	/ /			CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

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.)

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Theft by Failure to Make Required Disposition of Funds.							
Acts of the accused associated with this Offense: October 24, 2022 to February 16, 2023: \$1090.00							

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Theft by Unlawful Taking or Disposition.							
Acts of the accused associated with this Offense: October 24, 2022 to February 16, 2023: \$1090.00							

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 _____			
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
Statute Description (include the name of statute or ordinance): Receiving Stolen Property.							
Acts of the accused associated with this Offense: October 24, 2022 to February 16, 2023: \$1090.00							



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint Number	Incident Number CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

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.)

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 _____				
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Theft by Failure to Make Required Disposition of Funds.								
Acts of the accused associated with this Offense: November 12, 2019 to December 9, 2019: \$17,000.00								

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 _____				
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Dealing in Proceeds of Unlawful Activities.								
Acts of the accused associated with this Offense: November 12, 2019 to December 9, 2019.								

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 _____				
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance):								
Acts of the accused associated with this Offense:								

POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint Number	Incident Number
	/ /			CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: Sangemino	

2. 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.

3. 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.S. § 4904) relating to unsworn falsification to authorities.

4. This complaint consists of the preceding page(s) numbered 1 through 8.

5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

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

C-24 _____ 2025 _____
(Date) (Year)

Thomas Goggin
(Signature of Affiant)

AND NOW, on this date 6/24/25 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

15-1-01
MM/22

(Magisterial District Court Number)

MM/22
(Issuing Authority)





Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Affiant Biography

Affiant Thomas J. Goggin is a detective employed by the Chester County District Attorney's Office, 201 West Market Street, West Chester, Pennsylvania. Detective Goggin has been a sworn law enforcement officer in the Commonwealth of Pennsylvania for over 35 years. Detective Goggin was sworn in as a Chester County Detective on January 7, 2013, and is a sworn police officer in the Commonwealth of Pennsylvania and is empowered to conduct criminal investigations and make arrests for violations enumerated in the Pennsylvania Crimes Code (Title 18, Pennsylvania Consolidated Statutes as amended). Prior to his employment as a Chester County Detective, Goggin began his law enforcement career as an officer with the Phoenixville Borough Police Department, Chester County, PA, where he served as a field training officer, corporal, child abuse investigator, patrol and Detective Sergeant. As such, Detective Goggin has over 35 years of law enforcement experience. Detective Goggin's education and training include graduation from the Municipal Police Academy of the Montgomery County Community College, A.A.S in Criminal Justice from Montgomery County Community College, B.A. Organizational Management from Eastern College, M.S. Criminal Justice from the West Chester University of PA, and numerous training courses on initial responses to police incidents, contemporary forensics, investigatory use of digital devices, use of force in law enforcement, interview and interrogation, statement analysis, along with specialized training conducted by the Pennsylvania Homicide Investigators' Association. During the past 35 years Detective Goggin has conducted, participated, or managed numerous police investigations involving theft, robbery, sexual assault, narcotics, arson, and homicide. Detective Goggin has prepared numerous arrest and search warrant affidavits during his career and has also participated in the investigation, arrest, and prosecution of over 500 defendants.

Introduction:

This investigation pertains to criminal activities committed by Michael Sangemino, Esq., as Executor of the Estate of Doris Jean Boller, formerly of Kennett Square, Chester County, Pennsylvania. As Executor of the Boller Estate, Sangemino had access to the Boller Estate Account. Based upon interviews conducted and financial documents obtained by search warrant, the investigation has determined that Michael Sangemino stole money from the Boller Estate Account, moved it to accounts he owned, and then spent the money on himself or for personal purposes.

Case Facts and Evidence:

On September 10, 2024, the Chester County Detectives initiated an investigation into Michael J. Sangemino, who happens to be an attorney licensed to practice law in the Commonwealth of Pennsylvania, for the commission of criminal offenses in connection with the administration of the Estate of Doris Jean Boller, who passed away testate on August 28, 2016, at the age of 87 and with an address of 440 Kendal Drive, Kennett Square, Pennsylvania, 19348. A review in the early stages of this



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646

Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO
----------------	-------------------	-------------------	--------------------

AFFIDAVIT OF PROBABLE CAUSE

investigation of publicly available information regarding Mr. Sangemino from The Disciplinary Board of the Supreme Court of Pennsylvania website, a source of accurate information relating to Pennsylvania attorneys, revealed that Mr. Sangemino's Pennsylvania Attorney ID is 85285, that he was admitted to practice law in 2000, and that his office address was 224 East State Road, Suite B2E, Kennett Square, PA 19348 in Chester County.

Concerns regarding financial misappropriation of assets of the Estate of Doris Jean Boller emerged around March 18, 2024, when Doreen A. Harr, Senior Financial Investigator for the Pennsylvania Office of the Attorney General, Charitable Trust and Organizations section, reached out to McDaniel College and Kendal at Longwood. Pursuant to Ms. Boller's will, these institutions were both 25% residuary beneficiaries of the estate. Both beneficiaries verified they each received an interim payment in the amount of \$150,000; however, neither received the proposed final residual distribution to each in the amount or approximate amount of \$49,479.52

The Office of the Attorney General ("OAG") has supplied Chester County Detectives with copies of communications that verify the actual disbursement of the interim charitable donations.

- In a letter dated June 11, 2018, Vickie E. Shaffer, Vice President for Institutional Advancement at McDaniel College, acknowledged receipt of the donation of \$150,000. The letter was addressed to the Law Office of Jennifer Nash, Attn: Jennifer Nash, 933 South High Street, West Chester, PA 19382.
- In a letter dated June 25, 2018, Philip G. DeBaun, Chief Executive Officer of Kendal Crosslands, acknowledged receipt of the donation of \$150,000. The letter was addressed to the Estate of Doris Jean Boller, c/o Michael J. Sangemino, Executor, 933 South High Street, Suite A, West Chester, PA 19382.

OAG has also furnished Chester County Detectives with a date-stamped copy of "Petition for Filing of Accounting" in *In the Matter of: Estate of Doris Jean Boller*, Court of Common Pleas, Chester County, Pennsylvania, Orphans' Court Division, No. 1516-1619, filed by L. Peter Temple, Esquire, representing Kendal at Longwood, the petitioner, on March 28, 2024. Detective Goggin reviewed the Petition and Exhibits and noted the following observations.

- a) Letters testamentary were first granted in the Decedent's estate in the Chester County Register of Wills on September 7, 2016, to Michael Sangemino, Esquire. The Chester County Register of Wills file number is also 1516-1619.
- b) The Decedent's Will designated four residuary beneficiaries of her estate: 25% of the residue to her sister, Janet E. Heins, 25% of the residue to her brother, John R. Boller,



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646

Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO
----------------	-------------------	-------------------	--------------------

AFFIDAVIT OF PROBABLE CAUSE

25% of the residue to McDaniel College, a 501 (c)(3) tax-exempt organization, and 25% of the residue to Kendal at Longwood, a 501(c)(3) tax-exempt organization.

- c) Correspondence from estate counsel, Jennifer Nash, dated April 25, 2018 to Kendal at Longwood advised that ¾ of the assets would be distributed in the then next several months, and the balance would be held "as a reserve pending clearance of the estate by the taxing authorities and will be used to pay any additional expenses, debts, fees, and other taxes of the estate pending final distribution".
- d) An interim account of the Estate of Doris Jean Boller made clear that the initial distribution was to total \$600,000, and that approximately \$200,000 was to be held back until all clearances were received as set forth in Jennifer Nash's letter of April 25, 2018. More specifically, in Exhibit "D" to the petition, a document titled, "Estate of Doris J. Boller, Deceased Schedule of Distribution, signed by Michael J. Sangemino, Executor of the Estate of Doris J. Boller, and dated April 25, 2018, it is stated, "The combined balance of the Estate, in the hands of the Executor, is currently valued at Eight Hundred Two Thousand Five Hundred Twenty-Nine Dollars and Ten Cents (\$802,529.10)." "The Executor proposes to Hold Two Hundred Two Thousand Five Hundred Twenty-Nine Dollars and Ten Cents (\$202,529.10) as a reserve. Said reserve shall be maintained for the purposes of providing for the payments of any additional expenses, fees, attorney fees, commissions, taxes and/or other liabilities that are, or are found to be, due and payable with regard to the administration of the Estate." Mr. Sangemino, then, lists the interim distributions to the four residuary beneficiaries each in the amount of \$150,000 (which totals \$600,000) and, then, states, "Upon filing the final fiduciary income tax returns, payment of any additional expenses, fees, attorney fees, commission, taxes and/or other, upon receipt of any refunds or other assets due, and upon receipt of clearance from the respective taxing authorities, the Executor will provide the beneficiaries with an Informal Final Account of the Estate and shall distribute the remainder of the reserve with any increases or decreases thereto, to the beneficiaries based upon their respective shares of the Estate."
- e) In paragraph 14 of the petition, it is stated, "To date, Petitioner has not received the full and final distribution of their 25% bequest from the residue of the Doris Jean Boller Estate, nor has Petitioner signed a Receipt, Release, and Indemnification evidencing their receipt of this distribution."



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	SANGEMINO

AFFIDAVIT OF PROBABLE CAUSE

f) The petitioner attorney, L.Peter Temple, Esquire, has twice contacted Michael Sangemino to discuss this situation. Mr. Sangemino was unable to participate in either of those conference calls for unspecified reasons.

The Payment Checks:

On October 23, 2024, Senior Financial Investigator Harr provided the Chester County District Attorney's Office with email between Senior Deputy Attorney General Pamela Fingerhut (of OAG) and Jennifer S. Nash, attorney for the Boller Estate, as well as images of checks written or purportedly written on the Boller Estate account, provided to Senior Deputy Attorney General Fingerhut by Attorney Nash. On June 17, 2021, Attorney Fingerhut emailed Attorney Nash, "Jen: What is the status of the above estate? As you know, the decedent died in 2016. Hopefully, you can send me an Account for this estate in the very near future and the charities can be paid their share of the estate." On the same day, Attorney Nash replied via email, "Pam, I reached out to the executor today to let him know that we need to get this wrapped up. I will let you know when I hear from him and will give you an estimated time table." On July 15, 2021, Attorney Fingerhut emailed Attorney Nash, "Jen: Have you heard back from the executor?" to which Attorney Nash responded by email, "Yes, I finally did. I am meeting with him next week to put the final paperwork together." On September 13, 2021, Attorney Fingerhut followed-up via email, "Jen: I hope you are well. Just checking in to see what the status of the account is." On September 17, 2021, Attorney Nash emailed Attorney Fingerhut, "Pam, Thanks so much for your patience. An informal, summary accounting is attached. Let me know if you have any questions." A document entitled "INFORMAL ACCOUNTING Estate of Doris Boller, Deceased" concludes with the following proposed final distribution to beneficiaries --

TO: Janet E. Heins	\$49,479.53
TO: John R. Boller	\$49,479.53
TO: McDaniel College	\$49,479.53
TO: Kendall at Longwood	<u>\$49,479.52</u>
TOTAL	\$197,918.11

On March 22, 2022, Attorney Nash sent an e-mail message to Senior Deputy Attorney General Fingerhut pertaining to the Estate of Doris Jean Boller. The message reads in part, "Attached are copies of the final distribution checks that are going out today via priority mail."



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Detective Goggin reviewed copies of the check images and noted the following observations.

- a) Check #166, dated 3-22-2022, is made payable to McDaniel College in the amount of \$49,479.55. The Payor is "EST OF ESTATE OF DORIS BOLLER EXC MICHAEL J SANGEMINO", 7 Great Valley Parkway Ste 290, Malvern PA 19355. The bank is listed as BB&T and the account number is *****6559.
- b) Check #167, dated 3-22-2022, is made payable to Kendal at Longwood in the amount of \$49,479.52. The Payor is "EST OF ESTATE OF DORIS BOLLER EXC MICHAEL J SANGEMINO", 7 Great Valley Parkway Ste 290, Malvern PA 19355. The bank is listed as BB&T and the account number is *****6559.
- c) Check #168, dated 3-22-2022, is made payable to Janet E. Heins in the amount of \$49,479.52. The Payor is "EST OF ESTATE OF DORIS BOLLER EXC MICHAEL J SANGEMINO", 7 Great Valley Parkway Ste 290, Malvern PA 19355. The bank is listed as BB&T and the account number is *****6559.
- d) Check #169, dated 3-22-2022, is made payable to John R. Boller in the amount of \$49,479.52. The Payor is "EST OF ESTATE OF DORIS BOLLER EXC MICHAEL J SANGEMINO", 7 Great Valley Parkway Ste 290, Malvern PA 19355. The bank is listed as BB&T and the account number is *****6559.

On November 6, 2024, Detective Goggin spoke with Mr. James Heins who is the widower of Mrs. Janet E. Heins, a designated beneficiary for the Estate of Doris Boller. Mr. Heins said his wife did not receive a check payment in the amount of \$49,479.52. Detective Goggin also spoke with Mr. John Boller on November 6, 2024. Mr. Boller is a designated beneficiary for the Estate of Doris Boller. Mr. Boller said he did not receive a check payment in the amount of \$49,479.52.

The Payee's name and the check's value seem to be written by hand, and a signature is present at the bottom to authorize the payment. Detective Goggin is familiar with BB&T Bank which merged with Sun Trust Banks in 2019 to form Truist Financial. On December 12, 2022, Attorney Nash emailed Justin Royer regarding the Estate of Doris Jean Boller, stating in relevant part, "I sent copies of the checks back in March, and letters from the charities acknowledging the initial distributions back in September of 2021. I have also attached copies of the final distribution cancelled checks to the charitable beneficiaries for your records . . ." Senior Financial Investigator Harr has advised the Chester County District Attorney's Office that Justin Royer was a clerical assistant with her office. The check images provided to Mr. Royer by Attorney Nash, appearing to be cancelled checks payable to McDaniel College and Kendal at Longwood (Check # 166 and Check # 167) include images of the back sides of the checks making it appear that the checks were legitimately deposited. Check #166, payable to McDaniel College, is handwritten endorsed on the back, "For deposit only" followed by numbers and what appear to be



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

initials. Check #167, payable to Kendal at Longwood, has printed on the back side "FOR DEPOSIT ONLY KENDAL CROSSLANDS" followed by what appears to be an account number.

Table 1. Associated Bank Records.

FINANCIAL ACCOUNTS			
Financial Institution	Account Ending	Account Owner	Confidential FAN
Truist Bank/BB&T	*****6559	Est. of Doris Boller, Exc. Michael Sangemino	FAN1
TD Bank	*****7068	Michael Sangemino, IOLTA Trust Account.	FAN2
TD Bank	*****7076	Michael J. Sangemino, DBA Michael J. Sangemino, Esq.	FAN3
TD Bank	*****6496	Michael Sangemino Law Office.	FAN4
TD Bank	*****0447	Michael and John Sangemino	FAN5
TD Bank	*****1531	Your Services, LLC., Michelle Fisher.	FAN6
TD Bank	*****1028	Michelle Lynn Fisher	FAN7
BNY Mellon, Corestone Acct.	*****1016	Est. of Doris Boller, Michael J. Sangemino, Executor	FAN8

Records in Possession of Truist Financial

On November 9, 2024, Detective Thomas Goggin obtained a Search Warrant for Truist Financial, as successor to BB&T (Branch Banking and Trust Company), for records, documents and/or data pertaining or relating to Branch Banking and Trust Company Account No. *****6559 (full account number is set forth on the attached Confidential Information Form as FAN1), Account holder "EST OF ESTATE OF DORIS BOLLER EXC MICHAEL J SANGEMINO". The requested records were received on December 4, 2024, and reviewed as part of this ongoing investigation.

Detective Goggin reviewed the records and noted the following relevant information. BB&T Account *****6559 is an Estate account - - on the BB&T signature card for this account, there is a block for "OWNERSHIP DESIGNATION" and in that block is typed "Estate" - - and the account was opened on September 12, 2016 by Michael Sangemino. The BB&T Signature card contains the name and address of depositor(s) as: "EST OF ESTATE OF DORIS BOLLER, EXC MICHAEL J SANGEMINO, 7 GREAT VALLEY PARKWAY STE 290, MALVERN, PA. The signature of Michael Sangemino, Executor appears next to "Estate of Doris Boller" at the bottom of the document as does the signature of Michael Sangemino, as "Signature of Executor/Executrix", along with the date of September 12, 2016, and what appears to be the Social Security Number of Michael Sangemino. The Identification of Michael Sangemino appears to have been provided by a Delaware Driver's License containing the Driver License Number, Expiration Date, and Date of Birth for Michael Sangemino. Detective Goggin conducted a search of Driver License Records and confirmed the biographical information on the account record matches the Driver Licensing



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Records for Michael Sangemino in the State of Delaware (full driver license and social security numbers are set forth on the attached Confidential Information Form as DLN1 and SSN1, respectively).

Detective Goggin noted that the four checks dated March 22, 2022, which Attorney Nash provided to OAG, which appear to have been written on checks provided for this account, were not debited to the account. They bear check numbers 164, 166, 167 and 168. Each is in the amount of \$49,479.52 or \$49,479.55. The statements provided by Truist for the BB&T Estate account show that there was a gap between check number 158 and check number 169. Check numbers 164, 166, 167 and 168 fall within this gap.

Detective Goggin reviewed the BB&T Estate account records for the Boller Estate and noted that there were fifty-nine (59) checks actually written on this account and negotiated, of which fifty-eight (58) check were made payable to "Michael Sangemino, Esq." or "Michael J. Sangemino". The one check not made payable to Mr. Sangemino is the first one numerically and chronologically. It is check number 101, it is dated April 10, 2019, and it is made payable to "PA Department of Revenue". It is in the amount of \$44.00. None of the fifty-nine (59) checks are made payable to McDaniel College, Kendal at Longwood, Janet Heins, or John Boller. All fifty-nine (59) checks are written by hand and a signature is present at the bottom to authorize payment, with the exception of two. One of these two is check number 104, dated December 4, 2019 in the amount of \$10,000 made payable to "Michael Sangemino, Esq". The other of the two is check number 121, dated December 20, 2019 in the amount of \$3,000 made payable to "Michael J. Sangemino, Esq". The earliest check to Mr. Sangemino chronologically is dated November 12, 2019, is in the amount of \$3,000, and there is no reference in the memo line of the check. The most recent check chronologically is dated February 16, 2023, is in the amount of \$90.00, and there is no reference recorded in the memo line of the check. For the period of November 12, 2019, to February 16, 2023, Mr. Sangemino issued fifty-eight (58) checks made payable to himself in the cumulative amount of \$196,240.

The fifty-eight (58) checks Mr. Sangemino wrote to himself on the BB&T Estate account are as follows --

Check #102 This check is dated November 12, 2019 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "20191112" which means that the check was deposited or negotiated on November 12, 2019.

Check #104 This check is dated December 4, 2019 and is made payable to :Michael Sangemino, Esq" in the amount of \$10,000.00. On the backside are various printed numbers including "20191204" which means that the check was deposited or negotiated on December 4, 2019.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

Check #106 This check is dated December 9, 2019 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$4,000.00. On the backside are various printed numbers including "20191209" which means that the check was deposited or negotiated on December 9, 2019.

Check #107 This check is dated September 1, 2020 and is made payable to "Michael J. Sangemino, Esq." in the amount of \$3,000.00. On the backside are various printed numbers including "9/1/2020 8:21:56 AM" which means that the check was deposited or negotiated on September 1, 2020 at 8:21:56 a.m.

Check #108 This check is dated October 1, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,500.00. On the backside are various printed numbers including "10/1/2020 9:09:19 AM" which means that the check was deposited or negotiated on October 1, 2020 at 9:09:19 a.m.

Check #109 This check is dated October 8, 2020 and is made payable to "Michael Sangemino, Esq" in the amount of \$500.00. On the backside are various printed numbers including "10/8/2020 8:14:48 AM" which means that the check was deposited or negotiated on October 8, 2020 at 8:14:48 a.m.

Check #111 This check is dated October 12, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "10/12/2020 9:22:30 AM" which means that the check was deposited or negotiated on October 12, 2020 at 9:22:30 a.m.

Check #113 This check is dated October 13, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "10/13/2020 8:00:35 AM" which means that the check was deposited or negotiated on October 13, 2020 at 8:00:35 a.m.

Check #115 This check is dated November 10, 2020 and is made payable to "Michael Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "11/10/2020 8:40:32 AM" which means that the check was deposited or negotiated on November 10, 2020 at 8:40:32 a.m.

Check #116 This check is dated November 24, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "11/24/2020 10:53:43 AM" which means that the check was deposited or negotiated on November 24, 2020 at 10:53:43 a.m.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	SANGEMINO

AFFIDAVIT OF PROBABLE CAUSE

Check #117 This check is dated December 2, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,500.00. On the backside are various printed numbers including "12/2/2020 8:20:38 AM" which means that the check was deposited or negotiated on December 2, 2020 at 8:20:38 a.m.

Check #118 This check is dated December 7, 2020 and is made payable to "Michael Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "20201207" which means that the check was deposited or negotiated on December 7, 2020.

Check #119 This check is dated December 8, 2020 and is made payable to "Michael Sangemino, Esq" in the amount of \$2,000.00. On the backside are various printed numbers including "12/8/2020 8:08:10 AM" which means that the check was deposited or negotiated on December 8, 2020 at 8:08:10 a.m.

Check #120 This check is dated December 11, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,500.00. On the backside are various printed numbers including "12/11/2020 8:27:36 AM" which means that the check was deposited or negotiated on December 11, 2020 at 8:27:36 a.m.

Check #121 This check is dated December 16, 2020 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "20201216" which means that the check was deposited or negotiated on December 16, 2020.

Check #122 This check is dated December 29, 2020 and is made payable to "Michael Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "20201229" which means that the check was deposited or negotiated on December 29, 2020.

Check #123 This check is dated December 31, 2020 and is made payable to "Michael Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "20201231" which means that the check was deposited or negotiated on December 31, 2020.

Check #124 This check is dated January 12, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$4,000.00. On the backside are various printed numbers including "1/12/2021 8:31:25 AM" which means that the check was deposited or negotiated on January 12, 2021 at 8:31:25 a.m.

Check #125 This check is dated January 13, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$1,200.00. On the backside are various printed numbers including "1/13/2021 12:43:00 PM" which means that the check was deposited or negotiated on January 13, 2021 at 12:43:00 p.m.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint:	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #126 This check is dated January 18, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$1,500.00. On the backside are various printed numbers including "1/18/2021 8:22:21 AM" which means that the check was deposited or negotiated on January 18, 2021 at 8:22:21 a.m.

Check #128 This check is dated January 26, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "20210126" which means that the check was deposited or negotiated on January 26, 2021.

Check #130 This check is dated January 27, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$2,000.00. On the backside are various printed numbers including "1/27/2021 8:03:19 AM" which means that the check was deposited or negotiated on January 27, 2021 at 8:03:19 a.m.

Check #132 This check is dated February 4, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,500.00. On the backside are various printed numbers including "20210204" which means that the check was deposited or negotiated on February 4, 2021.

Check #133 This check is dated February 5, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "2/5/2021 9:23:23 AM" which means that the check was deposited or negotiated on February 5, 2021 at 9:23:23 a.m.

Check #134 This check is dated February 5, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "2/5/2021 11:15:19 AM" which means that the check was deposited or negotiated on February 5, 2021 at 11:15:19 a.m.

Check #135 This check is dated February 15, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "2/15/2021 7:48:49 AM" which means that the check was deposited or negotiated on February 15, 2021 at 7:48:49 a.m.

Check #136 This check is dated February 24, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "2/24/2021 8:36:42 AM" which means that the check was deposited or negotiated on February 24, 2021 at 8:36:42 a.m.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #137 This check is dated March 1, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "3/1/2021 8:00:33 AM" which means that the check was deposited or negotiated on March 1, 2021 at 8:00:33 a.m.

Check #139 This check is dated March 3, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,900.00. On the backside are various printed numbers including "20210303" which means that the check was deposited or negotiated on March 3, 2021.

Check #140 This check is dated March 10, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$2,000.00. On the backside are various printed numbers including "3/10/2021 8:00:51 AM" which means that the check was deposited or negotiated on March 10, 2021 at 8:00:51 a.m.

Check #141 This check is dated March 11, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,500.00. On the backside are various printed numbers including "20210311" which means that the check was deposited or negotiated on March 11, 2021.

Check #142 This check is dated March 17, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$500.00. On the backside are various printed numbers including "3/17/2021 8:11:02 AM" which means that the check was deposited or negotiated on March 17, 2021 at 8:11:02 a.m.

Check #143 This check is dated March 18, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "3/18/2021 8:00:00 AM" which means that the check was deposited or negotiated on March 18, 2021 at 8:00:00 a.m.

Check #144 This check is dated March 23, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "3/23/2021 7:50:31AM" which means that the check was deposited or negotiated on March 23, 2021 at 7:50:31 a.m.

Check #145 This check is dated March 29, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$2,000.00. On the backside are various printed numbers including "3/29/2021 7:57:36 AM" which means that the check was deposited or negotiated on March 29, 2021 at 7:57:36 a.m.

Check #146 This check is dated April 1, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "4/2/2021 8:19:26 AM" which means that the check was deposited or negotiated on April 2, 2021 at 8:19:26 a.m.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

Check #147 This check is dated April 5, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$500.00. On the backside are various printed numbers including "4/5/2021 8:03:43 AM" which means that the check was deposited or negotiated on April 5, 2021 at 8:03:43 a.m.

Check #148 This check is dated April 8, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$3,000.00. On the backside are various printed numbers including "4/8/2021 7:57:04 AM" which means that the check was deposited or negotiated on April 8, 2021 at 7:57:04 a.m.

Check #150 This check is dated April 16, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$6,500.00. On the backside are various printed numbers including "20210416" which means that the check was deposited or negotiated on April 16, 2021.

Check #151 This check is dated April 29, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$3,500.00. On the backside are various printed numbers including "4/29/2021 8:18:42 AM" which means that the check was deposited or negotiated on April 29, 2021 at 8:18:42 a.m.

Check #152 This check is dated May 4, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$4,500.00. On the backside are various printed numbers including "5/4/2021 8:07:35 AM" which means that the check was deposited or negotiated on May 4, 2021 at 8:07:35 a.m.

Check #153 This check is dated May 13, 2021 and is made payable to "Michael Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "5/13/2021 8:00:49 AM" which means that the check was deposited or negotiated on May 13, 2021 at 8:00:49 a.m.

Check #154 This check is dated May 24, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "20210524" which means that the check was deposited or negotiated on May 24, 2021.

Check #155 This check is dated June 11, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$4,450.00. On the backside are various printed numbers including "6/11/2021 8:14:49 AM" which means that the check was deposited or negotiated on June 11, 2021 at 8:14:49 a.m.

Check #156 This check is dated June 28, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,600.00. On the backside are various printed numbers including "20210628" which means that the check was deposited or negotiated on June 28, 2021.

Check #158 This check is dated September 1, 2021 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$2,500.00. On the backside are various printed numbers including "9/1/2021 12:14:45 PM" which means that the check was deposited or negotiated on September 1, 2021 at 12:14:45 p.m.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #169 This check is dated April 18, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "4/18/2022 2:45:03 PM" which means that the check was deposited or negotiated on April 18, 2022 at 2:45:03 p.m.

Check #170 This check is dated April 29, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$2,500.00. On the backside are various printed numbers including "4/29/2022 10:21:04 AM" which means that the check was deposited or negotiated on April 29, 2022 at 10:21:04 a.m.

Check #171 This check is dated May 24, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "5/24/2022 7:44:46 AM" which means that the check was deposited or negotiated on May 24, 2022 at 7:44:46 a.m.

Check #172 This check is dated June 1, 2022 and is made payable to "Michael Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "6/1/2022 7:58:51 AM" which means that the check was deposited or negotiated on June 1, 2022 at 7:58:51 a.m.

Check #173 This check is dated June 3, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "6/3/2022 8:01:42 AM" which means that the check was deposited or negotiated on June 3, 2022 at 8:01:42 a.m.

Check #176 This check is dated June 16, 2022 and is made payable to "Michael Sangemino, Esq" in the amount of \$9,000.00. On the backside are various printed numbers including "20220616" which means that the check was deposited or negotiated on June 16, 2022.

Check #177 This check is dated June 21, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "6/21/2022 8:04:57 AM" which means that the check was deposited or negotiated on June 21, 2022 at 8:04:57 a.m.

Check #178 This check is dated June 28, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "6/28/2022 8:17:20 AM" which means that the check was deposited or negotiated on June 28, 2022 at 8:17:20 a.m.

Check #179 This check is dated July 22, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$4,000.00. On the backside are various printed numbers including "7/22/2022 7:33:47 AM" which means that the check was deposited or negotiated on July 22, 2022 at 7:33:47 a.m.

Check #180 This check is dated July 27, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$5,000.00. On the backside are various printed numbers including "7/27/2022 7:54:12 AM" which means that the check was deposited or negotiated on July 27, 2022 at 7:54:12 a.m.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First:	Middle:	Last:	CC-24-01646

Defendant Name First: Michael Middle: Joseph Last: SANGEMINO

AFFIDAVIT OF PROBABLE CAUSE

Check #181 This check is dated October 24, 2022 and is made payable to "Michael J. Sangemino, Esq" in the amount of \$1,000.00. On the backside are various printed numbers including "10/24/2022 8:59:13 AM" which means that the check was deposited or negotiated on October 24, 2022 at 8:59:13 a.m.

Check #182 This check is dated February 16, 2023 and is made payable to "Michael Sangemino, Esq" in the amount of \$90.00. On the backside are various printed numbers including "2/16/2023 8:06:25 AM" which means that the check was deposited or negotiated on February 16, 2023 at 8:06:25 a.m.

Detective Goggin noted a ten (10) digit number ending in 7068 is written on the backside of some of the checks written to Mr. Sangemino, and the backside of most of the other checks written to him have stamped "TD Mobile Deposit" and the same ten (10) digit number ending in 7068 (full account number is set forth on the Confidential Information Form as FAN2). On the back side of check number 104 are what appears to be a signature and handwritten the same ten (10) digit number ending in 7068. On the back side of check number 121 are what appear to be a signature and handwritten the same ten (10) digit number ending in 7068. The bank statements for the BB&T account show that check numbers 104 and 121 were honored (notwithstanding that they were not signed by the accountholder on the front side of the checks). Two of the checks written to Mr. Sangemino, check numbers 181 and 182, dated, respectively, October 24, 2022 and February 16, 2023, in the respective amounts of \$1,000 and \$90.00, also have on the backside the "TD Mobile Deposit" stamp but, instead of the ten (10) digit number ending in 7068, there is a different ten (10) digit number ending in 7076, but with the same first six (6) digits. The checks that do not have the "TD Mobile Deposit" stamp and the ten (10) digit number ending in 7068 or 7076 printed on the back side have printed on the back side three rows of data. The first row consists of twenty-six (26) digits followed by the BB&T Boller Estate account number. The second row consists of three capitalized letters followed by underscore followed by DEBIT followed by another set of capitalized letters followed by the amount of the check. The third row has the name of a town in capital letters followed by seventeen (17) numbers. For example, the backside of check number 102 has all of these characteristics. The printed letters in the second row of data following "DEBIT" are "NLAYTON" The name of the town is "WESTTOWN". The backside of this check has what appears to be a signature, and handwritten is the ten (10) digit number ending in 7068. The backside of check number 141 also has all of the same characteristics. The printed letters in the second row of data following "DEBIT" are "NLAYTON", and the name of the town is "WESTTOWN". What appears to be a signature appears on the backside of this check, but no account number is handwritten on it. Based upon what appears on the backside of the checks that do not have the "TD Mobile Deposit" stamp, it is likely that these checks were deposited into *****7068 as counter deposits at TD branches, including a TD branch in Westtown, Pennsylvania.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

A review of the BB&T Estate account statements for the Boller Estate shows that they cover the time period of December, 2017 to November, 2024. They show that the balance on the account on December 5, 2017 was \$7,788.55. This balance remained the same until check number 101, the check dated April 10, 2019 made payable to "PA Department of Revenue" in the amount of \$44.00, was written and negotiated, reducing the balance to \$7,744.55. The account balance, then, remained at \$7,744.55 until November, 2019. On November 12, 2019, there were two deposits into the account. One was a check in the amount of \$173,130.79, written on a Bank of New York Mellon Corestone account in the name of "Estate of Doris J. Boller Michael J. Sangemino Executor". Detective Goggin examined an image of the check and accompanying deposit ticket provided by BB&T Bank and noted the following observations.

- Check #140, dated 11-11-2019, is made payable to "Estate of Doris J Boller" in the amount of \$173,130.79. The Payor is "ESTATE OF DORIS BOLLER MICHAEL J SANGEMINO EXECUTOR. The address of 7 Great Valley Parkway Ste 290, Malvern PA 19355 is partially obscured by a handwritten line, while the address 933 South High Street, West Chester PA 19382 is inscribed in handwritten format on the right-hand side of the Payor information, along with the phone number of 610-701-0780. The signature of Michael Sangemino is present at the bottom to authorize payment. The endorsement on the backside of the check image does not appear fully legible.
- The backside of the check image contains the account number for the BB&T Boller Estate Account and is time and date stamped 11-12-2019 at 10:33.
- BB&T Bank records also include a Deposit Ticket identifying the Account Owner as "EST OF DORIS BOLLER EXC MICHAEL J. SANGEMINO, 7 GREAT VALLEY PAKWAY, STE 290, MALVERN, PA 19355." The date of the deposit is handwritten as "11-11-19" and the Deposit amount is handwritten in the amount of \$173,130.

The other deposit on November 12, 2019 was a check in the amount of \$1,801.64 and comprised two checks both of which were expired and therefore returned with a resultant bank fee charged to the account of \$12.00. Also on November 12, 2019 was a transfer of \$326.10 from a checking account with a thirteen (13) digit account number ending in 5301. On November 14, 2019, there was a deposit in the amount of \$15,050.01. After the writing and negotiating of two checks on the BB&T account (check number 102 and check number 104, both made payable to Michael Sangemino totaling \$13,000), the balance on the account, as of December 4, 2019, was \$183,227.45. From December 4, 2019 to November, 2024, the totality of the activity on the account consisted of (1) one counter deposit in the amount of \$13.93 appearing on the July 6, 2021 statement; and (2) the writing and negotiating of fifty-six (56) checks, all written to "Michael Sangemino, Esq" or "Michael J. Sangemino Esq" bringing the account balance down to \$1.38. The ending balance on the account for September, 2021 was \$47,591.38, and it remained that through the April, 2022 statement period, after which the account



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646

Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO
----------------	--------------------------	--------------------------	---------------------------

AFFIDAVIT OF PROBABLE CAUSE

balance was reduced to \$1.38, so that the balance was insufficient to cover the four checks dated March 22, 2022, had those checks really been intended to go to, and actually been sent to, McDaniel College, Kendal at Longwood, Janet Heins and John Boller. The BB&T statements show that the \$47,591.38, except for \$1.38, went, not to McDaniel College, Kendal at Longwood, Janet Heins or John Boller, but to Michael Sangemino.

Given that (1) the BB&T Boller Estate records show that check numbers 164, 166, 167 and 168 were never negotiated, (2) these checks were never sent to and received by McDaniel College, Kendal at Longwood, Janet Heins or John Boller; and (3) the BB&T records show that from November, 2019 to November, 2024, all of the money in the account, except for a bank fee of \$12.00 and \$1.38, totaling \$196,240, went to Michael Sangemino, there is probable cause to believe that what Attorney Nash called "canceled checks to the fiduciary beneficiaries" which she furnished to OAG as proof of final payments to McDaniel College and Kendal at Longwood were actually forgeries provided to her by Mr. Sangemino.

Detective Goggin has obtained copies of documents from the Chester County Register of Wills, located in the Chester County Justice Center, 201 West Market Street, West Chester, Chester County, PA 19380 relating to the Estate of Doris Jean Boller, Deceased, Estate File No. 1516-1619, including the following --

Decree of Probate and Grant of Letters Testamentary;

REV-1500 Inheritance Tax Return Resident Decedent;

Notice of Inheritance Tax Appraisement, Allowance or Disallowance of Deductions and Assessment of Tax;

Pa.O.C. Rule 10.6 Status Report.

The Decree of Probate and Grant of Letters Testamentary was issued on September 7, 2016 by Terri Clark, Register of Wills, Chester County, Commonwealth of Pennsylvania, by one of her deputies, with the official seal, to Michael J. Sangemino. The REV-1500 Inheritance Tax Return is dated April 23, 2018. It was filed on the same date with the Register of Wills -- it is stamped "FILED APR 23 2018 Register of Wills Chester County, PA". Below the printed statement, "Under penalties of perjury, I declare I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct and complete. Declaration of preparer other than the person responsible for filing the return is based on all information of which preparer has any knowledge.", are two signatures, one the "SIGNATURE OF PERSON RESPONSIBLE FOR FILING RETURN" with an address of 7 Elm Avenue, Newark, DE 19711, the other the "SIGNATURE OF PREPARER OTHER THAN PERSON RESPONSIBLE FOR FILING THE RETURN" with an address of 933 South High Street, West Chester, PA 19382. The Notice of Inheritance Tax Appraisement, Allowance or Disallowance of Deductions and Assessment of Tax is a Pennsylvania Department of Revenue document which was filed with the Register

Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	SANGEMINO

AFFIDAVIT OF PROBABLE CAUSE

of Wills on August 3, 2018. It is dated July 23, 2018, is addressed to Jennifer Nash, Esquire, 933 South High Street, West Chester, PA 19382-5400, and reflects that the Estate was due an inheritance tax refund of \$15,050.01. The status report document is dated November 5, 2018 and is signed by Michael J. Sangemino, 933 South High Street, First Floor North, West Chester, PA 19382. On this document, Mr. Sangemino indicates "Yes" to whether administration of the estate is complete but, then, indicates the date of November 5, 2019 in response to "[i]f the answer is No, state when the personal representative reasonably believes that the administration will be complete".

The Inheritance Tax Return identifies McDaniel College's 25% share of the residue of the Boller Estate to be \$233,002.71 and Kendal at Longwood's 25% share of the residue of the estate to also be \$233,002.71. The fiduciary fee (to Mr. Sangemino, a fiduciary in his capacity as Executor of the Boller Estate) is \$48,500. The attorney fee (to Ms. Nash) is \$48,500. The Interim Account, current to April 17, 2018, has \$40,000 for fiduciary fees and \$40,000 for attorney fees. The Informal Accounting which Ms. Nash provided to OAG on September 17, 2021 has the fiduciary fees and the attorney fees back up to \$48,500 each.

TD BANK SEARCH WARRANT GRANTED.

On December 17, 2024, on the basis of the foregoing factual information, Detective Thomas Goggin obtained a Search Warrant for TD Bank for records, documents and/or data pertaining or relating to TD Bank Account No. *****7068 (full account number is set forth on the attached Confidential Form as FAN 2) and TD Bank Account No. *****7076 (full account number is set forth on the attached Confidential Information Form as FAN 3). The requested records were received on December 23, 2024, and reviewed as part of this ongoing investigation.

With regard to *****7068, Detective Goggin reviewed what TD Bank produced pursuant to the search warrant and noted the following relevant information. TD Bank Account *****7068 is an IOLTA Trust Account in the name of "Michael J Sangemino, Esq" -- on the TD Bank signature card for this account, there is a block for account relationship that is described as "IOLTA-w/Signers" -- and the account was opened on March 19, 2014, by Mr. Sangemino. The TD Bank Signature card contains the business mailing address of 7 Great Valley Parkway, Ste. 290, Malvern PA, 19355 and, under "LEGAL ADDRESS (no PO Boxes)", the same Malvern, PA address appears. The signature of Michael J. Sangemino can be found at the bottom of the document along with his Date of Birth and Social Security Number. At the top left of the signature card is indicated that the region is "Suburban PA". Detective Goggin conducted a search of Driver License Records and confirmed the biographical information on the account record matches the Driver Licensing Records for Michael Sangemino in the State of Delaware (full Driver License and Social Security numbers are set forth in the attached Confidential Information Form as DLN1 and SSN1



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

respectively). The monthly bank statements for *****7068, provided by TD Bank, cover the time period of September 1, 2016 to November 30, 2024; from September 1, 2016 to June 30, 2020, the accountholder and accountholder address is "MICHAEL J SANGEMINO ESQ IOLTA TRUST ACCOUNT 7 GREAT VALLEY PKWY STE 290 MALVERN PA 19355"; from July 1, 2020 to November 30, 2024, the accountholder and accountholder address is "MICHAEL J SANGEMINO ESQ PA IOLTA ACCOUNT 7 GREAT VALLEY PKWY STE 290 MALVERN PA 19355".

With regard to *****7076, Detective Goggin reviewed what TD Bank produced pursuant to the search warrant and noted the following relevant information. TD Bank Account *****7076 is a business checking account in the name of "Michael J Sangemino DBA Michael J Sangemino, Esq" - - on the TD Bank signature card for this account, there is a block for account relationship that is described as "Sole Proprietor DBA-No Extra Signers" - - and the account was opened on March 19, 2014, by Mr. Sangemino. The TD Bank Signature card contains the business mailing address of 7 Great Valley Parkway, Ste. 290, Malvern PA, 19355. The signature of Michael J. Sangemino can be found at the bottom of the document along with his Date of Birth and Social Security Number. Under "LEGAL ADDRESS (No BO Boxes)", what is certainly "7 ELM AVE NEWARK DE 19711" is actually crossed out. At the top left corner, the region is indicated to be "Suburban PA". Detective Goggin conducted a search of Driver License Records and confirmed the biographical information on the account record matches the Driver Licensing Records for Michael Sangemino in the State of Delaware (full Driver License and Social Security numbers are set forth in the attached Confidential Information Form as DLN1 and SSN1 respectively). The monthly bank statements for *****7076, provided by TD Bank, cover the time period of September 1, 2016 to November 30, 2024 and, throughout that time period, the accountholder and accountholder address is "MICHAEL J SANGEMINO DBA MICHAEL J SANGEMINO ESQ ATTORNEY AND COUNSELOR AT LAW 7 GREAT VALLEY PARKWAY, SUITE 290 MALVERN PA 19355".

Synopsis of TD Bank Records:

A review of TD Bank's records for 7068 shows that it is an IOLTA account. Detective Goggin understands from his knowledge, experience and training that an IOLTA account is a lawyer trust account that has as its intended purpose the holding of client funds in trust. "IOLTA" is an acronym for "Interest on Lawyers' Trust Accounts". Mr. Sangemino, although an attorney, was, with respect to the Boller Estate, acting, not as an attorney, but rather as a lay person, an executor, but, nonetheless, he moved over \$195,000 from the BB&T Boller Estate executor account, which he, as executor, had opened, into his TD IOLTA account, and then proceeded to pay himself, Your Services, LLC, Michelle Fisher, Sharon Cook and Barbara Maffia. Some of the checks he wrote to Ms. Fisher, Ms. Cook or Ms. Maffia were explicitly gifts or Christmas presents which means that he used Boller Estate funds, to which he had been entrusted as a fiduciary, to give away as gifts or presents.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

TD's records for 7068 show that there were two periods of time of peak activity. The first period of time of peak activity was from October 2020 to June 2021. During this period of time, Mr. Sangemino wrote himself forty-one (41) checks on the Boller Estate account, totaling \$121,700, deposited these checks into his IOLTA account, and systematically wrote himself checks on his IOLTA account which he deposited into a checking account with an account number of *****6496 (full account number is set forth on the attached Confidential Information Form as FAN4). Most of these checks have on the backside "TD Mobile Deposit" and the account number from which it may readily be concluded that *****6496 is a TD Bank account number. He also transferred sums of money from the IOLTA account to not only checking account 6496 but also to another checking account with an account number of *****0447 (full account number is set forth on the attached Confidential Information Form as FAN5). Because these transactions were transfers from a TD Bank account (*****7068), one may readily conclude that *****0447, like *****6496, is a TD Bank account number. Early during this time period, he wrote checks to Your Services, LLC on the IOLTA account which were deposited into an account with an account number of *****1531 (full account number is set forth on the attached Confidential Information Form as FAN6). Because these checks to Your Services, LLC have on the backside "TD Mobile Deposit" and the account number, one may readily conclude that *****1531 is a TD Bank account number. Then, Sangemino wrote multiple checks on the IOLTA account to Michelle Fisher which were deposited into an account with an account number of *****1028 (full account number is set forth on the attached Confidential Information Form as FAN7). Because most of these checks to Michelle Fisher have on the backside "TD Mobile Deposit" and the account number, one may readily conclude that *****1028 is a TD Bank account number. Comparing the endorsements on the back sides of the checks written to Your Services, LLC with the endorsements on the back sides of the checks written to Michelle Fisher, the signatures are similar and, consequently, there is reason to believe that the money paid to Your Services, LLC was actually being paid to Ms. Fisher.

The second period of peak activity was from April 2022 to July, 2022. During this period of time, Mr. Sangemino wrote himself ten (10) checks on the Boller Estate account totaling \$46,500 which he proceeded to deposit into his IOLTA account, all or nearly all of which he electronically transferred to either a checking account with an account number of *****7076, which is Mr. Sangemino's TD Bank attorney operating account (full account number is set forth on the attached Confidential Information Form as FAN 3), or account *****6496. A review of TD Bank's records for 7076 shows that Sangemino maintained a measurable balance in the account, but, nonetheless, transferred Boller Estate funds from 7068 into 7076 and wrote multiple checks on 7076 to Michelle Fisher, Michelle Rawley or Barbara Maffia. Detective Goggin has probable cause to believe that payments to Michelle Fisher and Michelle Rawley are payments to one and the same person because of a TD Bank account in common of *****1028. An examination of the backsides of the checks made payable to Michelle Rawley from July, 2022 to October, 2023 reveals that most of them have "TD Mobile Deposit" and the account number of *****1028 (full account number is set forth on the attached Confidential Information Form as FAN 7),



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
CC-24-01646				
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

the same account number that appears on the backsides of most of the checks that were written to Michelle Fisher. Moreover, the signature endorsements on the backsides of the checks payable to Michelle Fisher and the signature endorsements on the backsides of the checks written to Michelle Rawley resemble each other (except that the last name "Fisher" is different from the last name "Rawley").

What follows is a spreadsheet (Table 2) prepared by Detective Goggin from what TD Bank has produced concerning *****7068 showing check payments drawn on the account made payable to Michael Sangemino and deposited into TD Bank 6496 Account:

Table 2: Deposits to TD Bank Account 6496.

Deposits into TD 6496 Account					
Date	Check	Payable to	Amount	Account	Endorsement
7/30/2020	308	Michael Sangemino	4,000.00	6496	Michael Sangemino
8/12/2020	309	Michael Sangemino	500.00	6496	Michael Sangemino
8/31/2020	310	Michael Sangemino	3,000.00	6496	Michael Sangemino
9/1/2020	311	Michael Sangemino	1,500.00	6496	Michael Sangemino
9/18/2020	312	Michael Sangemino	1,000.00	6496	Michael Sangemino
10/1/2020	313	Michael Sangemino	3,500.00	6496	Michael Sangemino
10/8/2020	314	Michael Sangemino	500.00	6496	Michael Sangemino
10/22/2020	318	Michael Sangemino	555.00	6496	Michael Sangemino
10/28/2020	320	Michael Sangemino	2,500.00	6496	Michael Sangemino
11/12/2020	323	Michael Sangemino	200.00	6496	Michael Sangemino
11/23/2020	324	Michael Sangemino	1,166.67	6496	Michael Sangemino
12/2/2020	327	Michael Sangemino	3,000.00	6496	Michael Sangemino
12/2/2020	329	Michael Sangemino	608.41	6496	Michael Sangemino
12/3/2020	331	Michael Sangemino	300.00	6496	Michael Sangemino



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

12/16/2020	337	Michael Sangemino	500.00	6496	Michael Sangemino
12/31/2020	340	Michael Sangemino	2,000.00	6496	Michael Sangemino
1/5/2021	341	Michael Sangemino	1,000.00	6496	Michael Sangemino
Total Payments: \$25,830.08					

What follows is a spreadsheet (Table 3) prepared by Detective Goggin from what TD Bank has produced concerning *****7068 and *****7076 showing check payments made payable to Michelle Fisher/Michelle Rawley and deposited into the TD Bank 1028 Account. Check Numbers above 370 are drawn on the 7076 Account.

Table 3: Deposits into Account 1028.

Deposits into TD 1028 Account					
Date	Check	Paid To	Amount	Account	Endorsement
12/3/2020	330	Michelle Fisher	1,200.00	1028	Michelle Fisher
12/11/2020	333	Michelle Fisher	2,000.00	1028	Michelle Fisher
12/14/2020	334	Michelle Fisher	1,000.00	1028	Michelle Fisher
12/21/2020	338*	Michelle Fisher	2,000.00	1028	Michelle Fisher
1/7/2021	342	Michelle Fisher	1,000.00	1028	Michelle Fisher
1/18/2021	343	Michelle Fisher	1,000.00	1028	Michelle Fisher
1/22/2021	345	Michelle Fisher	1,000.00	1028	Michelle Fisher
2/8/2021	347	Michelle Fisher	3,000.00	1028	Michelle Fisher
2/16/2021	349	Michelle Fisher	2,000.00	1028	Michelle Fisher
2/22/2021	350	Michelle Fisher	1,000.00	1028	Michelle Fisher
3/11/2021	353	Michelle Fisher	2,000.00	1028	Michelle Fisher
3/18/2021	354	Michelle Fisher	500.00	1028	Michelle Fisher
3/24/2021	356	Michelle Fisher	5,000.00	1028	Michelle Fisher
4/6/2021	357	Michelle Fisher	2,000.00	1028	Michelle Fisher



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

5/17/2021	361	Michelle Fisher	1,500.00	1028	Michelle Fisher
5/14/2021	360	Michelle Fisher	500.00	1028	Michelle Fisher
6/8/2021	362	Michelle Fisher	1,650.00	1028	Michelle Fisher
6/15/2021	363	Michelle Fisher	1,500.00	1028	Michelle Fisher
6/29/2021	364	Michelle Fisher	3,000.00	1028	Michelle Fisher
7/13/2021	371	Michelle Fisher	1,500.00	1028	Michelle Fisher
8/22/2021	368	Michelle Fisher	1,500.00	1028	Michelle Fisher
6/2/2022	492	Michelle Fisher	5,000.00	1028	
6/21/2022	496	Michelle Fisher	5,000.00	1028	Michelle Fisher
9/20/2022	512	Michelle Rawley	5,000.00	1028	Michelle Rawley
8/24/2022	511	Michelle Rawley	5,000.00	1028	Michelle Rawley
12/15/2022	516	Michelle Rawley	5,000.00	1028	Michelle Rawley
1/13/2022	520	Michelle Rawley	5,000.00	1028	Michelle Rawley
2/2/2023	522	Michelle Rawley	5,000.00	1028	Michelle Rawley
3/3/2023	525	Michelle Rawley	5,000.00	1028	Michelle Rawley
4/6/2022	526	Michelle Rawley	5,000.00	1028	Michelle Rawley
8/26/2023	T#	Michelle Rawley	1,000.00	1028	Michelle Rawley
10/4/2023	533	Michelle Rawley	5,000.00	1028	Michelle Rawley
2/6/2024	539	Michelle Rawley	2,000.00	1028	Michelle Rawley
Total Payments: \$88,850 (*338 Memo Line: "Merry Christmas").					

What follows is a spreadsheet (Table 4) prepared by Detective Goggin from what TD Bank has produced concerning *****7068 and *****7076 showing checks made payable to "Our Services, LLC" and deposited into the TD Bank 1531 Account. Check Numbers above 370 are drawn on the 7076 Account.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint:	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Table 4. Deposits into 1531 Account.

Deposits into TD 1531 Account					
Date	Check	Payable to	Amount	Account	Endorsement*
10/14/2020	315	Your Services	4,500.00	1531	Michelle Fisher
10/14/2020	316	Your Services	4,500.00	1531	Michelle Fisher
11/11/2020	322	Your Services	1,000.00	1531	Michelle Fisher
10/13/2021	470	Your Services	5,000.00	1531	Michelle Fisher
10/27/2021	471	Your Services	5,000.00	1531	Michelle Fisher
11/15/2021	473	Your Services	5,000.00	1531	Michelle Fisher
12/1/2021	475	Your Services	5,000.00	1531	Michelle Fisher
1/8/2022	478	Your Services	5,000.00	1531	Michelle Fisher
2/11/2022	480	Your Services	5,000.00	1531	Michelle Fisher
3/23/2022	483	Your Services	5,000.00	1531	Michelle Fisher
Total Payments: \$45,000.00 (* The signature endorsements on the back of these checks are similar to the signature endorsements on the back of the checks made payable to Michelle Fisher and, therefore, they are being attributed to Michelle Fisher)					

In addition to the above-described activities that relate specifically to TD Bank Accounts, Detective Goggin identified check payments that were processed at other financial institutions and constitute evidence of an ongoing fraud committed upon the Estate of Doris Boller.

What follows is a spreadsheet (Table 5) prepared by Detective Goggin from what TD Bank has produced concerning *****7068 and *****7076 showing checks made payable to Barbara Maffia and deposited into a DSP (Delaware State Police) Federal Credit Union. Check Numbers above 370 are drawn on the 7076 Account.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint:	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	
	Michael	Joseph		SANGEMINO

AFFIDAVIT OF PROBABLE CAUSE

Table 5.

Payments to Barbara Maffia					
Date	Check	Payable to	Amount	Account	Endorsement
12/21/2020	336	Barbara Maffia	1,000.00	12960	Barbara Maffia
3/18/2021	355	Barbara Maffia	1,000.00	12960	Barbara Maffia
6/29/2021	365	Barbara Maffia	2,500.00		Barbara Maffia
12/28/2021	370	Barbara Maffia	500.00		Barbara Maffia
3/23/2022	484	Barbara Maffia	500.00	2960	Barbara Maffia
6/3/2022	493	Barbara Maffia	7,000.00		Barbara Maffia
Total Payments: \$12,500.00					

TD Bank Records show additional check payments drawn on the 7068 and 7076 accounts made payable to Sharon Cook and processed at a different financial institution. Check Numbers above 370 are drawn on the 7076 Account. Table 6 is a spreadsheet prepared by Detective Goggin from his review of the 7068 and 7076 account records regarding checks made payable to Sharon Cook.

Table 6.

Payments to Sharon Cook					
Date	Check	Payable to	Amount	Account	Endorsement
11/25/2020	325*	Sharon Cook	5,000.00	3961	
12/11/2020	332*	Sharon Cook	5,000.00	3961	
1/22/2021	344	Sharon Cook	3,500.00	3961	
3/4/2021	352	Sharon Cook	5,900.00	3961	Sharon Cook
5/14/2021	359	Sharon Cook	1,000.00	3961	
Total Payments: \$20,400.00 (*325 and *332 Memo Line "gift")					



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Table 7 is a spreadsheet prepared by Detective Goggin from his review of TD Bank's records for *****7076 showing check payments to Michelle Rawley processed by another financial institution. Funds were drawn on the 7076 Account.

Table 7.

Additional Payments to Michelle Rawley					
Date	Check	Payable to	Amount	Account	Endorsement
7/28/2022	497	Michelle Rawley	15,000.00	7838	Michelle Rawley
5/8/2024	546	Michelle Rawley	4,000.00		Michelle Rawley
5/21/2024	547	Michelle Rawley	2,000.00		Michelle Rawley
8/1/2024	543	Michelle Rawley	2,000.00		Michelle Rawley
Total Payments: \$23,000.00					

Detailed Review of Processed Checks drawn on the 7068 IOLTA Account

Check #308 This check is dated July 30, 2020, is made payable to Michael Sangemino in the amount of \$4,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496" There is an identification number of "0264819172" on the backside of the check.

Check #309 This check is dated August 12, 2020, is made payable to Michael Sangemino in the amount of \$500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496." There is an identification number of "0285092155" that also appears on the back side of the check.

Check #310 This check is dated August 31, 2020, is made payable to Michael Sangemino in the amount of \$3,500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496" There is an identification number of "0242479198" that also appears on the back side of the check.

Check #311 This check is dated September 1, 2020, is made payable to Michael Sangemino in the amount of \$1,500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496." There is an identification number of "0100401220" that appears on the back side of the check.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint:	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #313 This check is dated October 1, 2020, is made payable to Michael Sangemino in the amount of \$3,500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496"

Check #314 This check is dated October 8, 2020, is made payable to Michael Sangemino in the amount of \$500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496"

Check #315 This check is dated October 14, 2020, is made payable to Your Services, LLC in the amount of \$4,500.00, is endorsed on the back side with what could be the signature of Michelle Fisher", and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1531"

Check #316 This check is dated October 14, 2020, is made payable to Your Services, LLC in the amount of \$4,500.00, is endorsed on the back side with what could be the signature of Michelle Fisher, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1531"

Check #318 This check is dated October 22, 2020, is made payable to Michael Sangemino in the amount of \$555.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496"

Check #320 This check is dated October 28, 2020, is made payable to Michael Sangemino in the amount of \$2,500.00, is endorsed on the back side, and on the back side appears handwritten "*****6496". "Hockessin" also appears on the back side suggesting that the check was deposited at the TD Bank branch in Hockessin, DE

Check #323 This check is dated November 12, 2020, is made payable to Michael Sangemino in the amount of \$200.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit, a date and time stamp, and "*****6496"

Check #322 This check is dated November 11, 2020, is made payable to Your Services, LLC in the amount of \$1,000.00, is endorsed on the back side with what could be the signature of Michelle Fisher, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1531"

Check #324 This check is dated November 23, 2020, is made payable to Michael Sangemino in the amount of \$1,166.67, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496"

Check #327 This check is dated December 2, 2020, is made payable to Michael Sangemino in the amount of \$3,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496"



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	
	Michael	Joseph	SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #325 This check is dated November 25, 2020, is made payable to Sharon Cook in the amount of \$5,000.00, has on the memo line written "GIFT", and is endorsed on the back side with what appears to be the signature of Sharon Cook and what appears to be an account number ending in *****3961.

Check #329 This check is dated December 2, 2020, is made payable to Michael Sangemino in the amount of \$608.41, and is endorsed on the back side with a signature and the handwritten number *****6496.

Check #331 This check is dated December 3, 2020, is made payable to Michael Sangemino in the amount of \$300.00, and is endorsed on the back side with a signature and the handwritten number *****6496.

Check #330 This check is dated December 3, 2020, is made payable to Michelle Fisher in the amount of \$1,200.00, is endorsed on the back side with a signature which resembles the signatures on the back sides of the checks made payable to Your Services, LLC, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #333 This check is dated December 11, 2020, is made payable to Michelle Fisher in the amount of \$2,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #334 This check is dated December 14, 2020, is made payable to Michelle Fisher in the amount of \$1,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #337 This check is dated December 16, 2020, is made payable to Michael Sangemino in the amount of \$500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****6496"

Check #332 This check is dated December 11, 2020, is made payable to Sharon Cook in the amount of \$5,000.00, has on the memo line written "GIFT", and is endorsed on the back side with what appears to be the signature of Sharon Cook and what appears to be an account number ending *****3961

Check #338 This check is dated December 21, 2020, is made payable to Michelle Fisher in the amount of \$2,000.00, has written on the memo line "Merry Christmas", is endorsed on the back side, and on the back side appears printed data which includes a date and time stamp and "*****1028"

Check #336 This check is dated December 21, 2020, is made payable to Barbara Maffia in the amount of \$1,000, and has written on the memo line "MERRY CHRISTMAS"



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #340 This check is dated December 31, 2020, is made payable to Michael Sangemino in the amount of \$2,000.00, and is endorsed on the back side with a signature and the handwritten number *****6496

Check #341 This check is mis-dated January 5, 2020, is made payable to Michael Sangemino in the amount of \$1,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp (1/5/2021 8:22:11 AM), and "*****6496"

Check #342 This check is dated January 7, 2021, is made payable to Michelle Fisher in the amount of \$1,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #343 This check is dated January 18, 2021, is made payable to Michelle Fisher in the amount of \$1,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #344 This check is dated January 22, 2021, is made payable to Sharon Cook in the amount of \$3,500.00, and is endorsed on the back side with what appears to be the signature of Sharon Cook and what appears to be an account ending in 3961.

Check #345 This check is dated January 22, 2021, is made payable to Michelle Fisher in the amount of \$1,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #347 This check is dated February 8, 2021, is made payable to Michelle Fisher in the amount of \$3,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #349 This check is dated February 16, 2021, is made payable to Michelle Fisher in the amount of \$2,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #350 This check is dated February 22, 2021, is made payable to Michelle Fisher in the amount of \$1,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #352 This check is dated March 4, 2021, is made payable to Sharon Cook in the amount of \$5,900.00, and is endorsed on the back side with what appears to be the signature of Sharon Cook and what appears to be an account ending in 3961.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

Check #353 This check is dated March 11, 2021, is made payable to Michelle Fisher in the amount of \$2,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #355 This check is dated March 18, 2021, is made payable to Barbara Maffia in the amount of \$1,000.00, and the backside is endorsed with the handwritten number 12960 and has printed "Delaware State Police FCU"

Check #354 This check is dated March 18, 2021, is made payable to Michelle Fisher in the amount of \$500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #356 This check is dated March 24, 2021, is made payable to Michelle Fisher in the amount of \$5,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #357 This check is dated April 6, 2021, is made payable to Michelle Fisher in the amount of \$2,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #361 This check is dated May 17, 2021, is made payable to Michelle Fisher in the amount of \$1,500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #360 This check is dated May 14, 2021, is made payable to Michelle Fisher in the amount of \$500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #359 This check is dated May 14, 2021, is made payable to Sharon Cook in the amount of \$1,000.00, and is endorsed on the back side with what appears to be the signature of Sharon Cook and what appears to be an account ending in 3961

Check #362 This check is dated June 8, 2021, is made payable to Michelle Fisher in the amount of \$1,630.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #363 This check is dated June 15, 2021, is made payable to Michelle Fisher in the amount of \$1,500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Check #364 This check is dated June 29, 2021, is made payable to Michelle Fisher in the amount of \$3,000.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Check #365 This check is dated June 29, 2021, is made payable to Barbara Maffia in the amount of \$2,500.00, and the backside is endorsed and has printed "Delaware State Police FCU"

Check #371 This check is dated July 13, 2021, is made payable to Michelle Fisher in the amount of \$1,500.00, is endorsed on the back side, and on the back side appears "TD Mobile Deposit", a date and time stamp, and "*****1028"

Review of Processed Checks TD Bank account ***7076**

Check #491 This check is dated April 19, 2022 and is made payable to Michelle Fisher in the amount of \$9,000.00. The back side of this check does not have "TD Mobile Deposit" or 1028, but has printed data from which it may be concluded that the check was deposited at a TD Bank branch in "Governors Square"

Check #492 This check is dated June 2, 2022, is made payable to Michelle Fisher in the amount of \$5,000.00, and, on the back side is "TD Mobile Deposit" and "*****1028". The signature on the back side of this check is not fully legible.

Check #493 This check is dated June 3, 2022, is made payable to Barbara Maffia in the amount of \$7,000.00, and, on the back side of the check, there is printed "Delaware State Police FCU" and Ms. Maffia's endorsement.

Check #496 This check is dated June 21, 2022, is made payable to Michelle Fisher in the amount of \$5,000.00, and, on the back side is "TD Mobile Deposit" and "*****1028". The signature on the back side of this check looks like Michelle Fisher's.

Check #495 This check is dated June 21, 2022, is made payable to Barbara Maffia in the amount of \$5,000.00, and, on the back side of the check, there is printed "Delaware State Police FCU" and Ms. Maffia's endorsement.

Check #497 This check is dated July 28, 2022, is made payable to Michelle Rawley in the amount of \$15,000.00. It is hard to determine from the printed data on the back side of the check into what bank account the check was deposited.

Check #511 This check is dated August 24, 2022, is made payable to Michelle Rawley in the amount of \$5,000.00, and on the back side appears "TD Mobile Deposit" and "*****1028" from which may be inferred that Michell Rawley and Michelle Fisher are one and the same.



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint:	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

Electronic Fund Transfers

TD Records for the IOLTA 7068 show funds were transferred electronically to TD Account 0447 and TD Operating Account 7076. There were four (4) transfers of funds to TD Bank Account 0447 from January 27, 2021 to April 20, 2021. All these transfers add up to \$10,000.

- On January 27, 2021, \$5,000 was electronically transferred to the CK 0447 Account.
- On January 28, 2021, \$2,000 was electronically transferred to CK 0447 Account.
- On February 27, 2021, \$2,000 was electronically transferred to CK 0447.
- On April 12, 2021, \$1,000 was electronically transferred to CK 0447.

TD records show that on November 17, 2022, an online activity caused \$5,000 to be transferred from TD 0447 and deposited back into TD 7068. On the same day, \$5,000 was transferred to TD 7076, indicating that Sangemino had access and control over TD Bank Account 0447.

Detective Goggin analyzed the TD Bank electronic fund transfers from 2019 to 2023 and identified a pattern of IOLTA funds being transferred into the 7076 Operating account, as outlined in Table 8.

Table 8. Account 7076 Deposits 2016 to 2019.

Deposits into Account *****7076 2016-2019			
M/Year	TD 7076 Deposit	M/Year	TD 7076 Deposit
9/16	1,974.75	2/18	2,218.31
10/16	3,080.71	3/18	4,455.31
11/16	1,950.87	4/18	3,296.00
12/16	2,352.00	5/18	6,143.00
1/17	2,470.00	6/18	4,850.21
2/17	2,596.53	7/18	3,305.70
3/17	2,259.62	8/18	1,840.00
4/17	2,296.00	9/18	3,143.00
5/17	7,359.00	10/18	7,092.36
6/17	3,914.56	11/18	6,291.10
7/17	2,472.02	12/18	5,520.59



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

8/17	4,459.93	1/19	9,846.56
9/17	2,797.25	2/19	8,759.55
10/17	1,809.72	3/19	9,532.00
11/17	1,877.38	4/19	2,697.50
12/17	3,252.54	5/19	6,795.00
1/18	2,564.00	6/19	13,500.00
7/19	4,441.50	7076 Electronic Deposit Activity.	
8/19	5,515.00	7076 Electronic Deposit Activity.	
9/19	3,290.00	7076 Electronic Deposit Activity.	
10/19	5,200.00	7076 Electronic Deposit Activity.	
11/19	No Activity	7076 Electronic Deposit Activity.	
12/19	10,000.00	7076 Electronic Deposit Activity.	
Total	\$177,219.57	7076 Electronic Deposit Activity.	

TD records show that there was little transfer action in 2020 when account 6496 first appeared.

Table 9. 2020 Account 6496 transfer deposit (\$6,316.00).

M/Year	6496 Deposits	M/Year	6496 Deposits
1/20	1,316.00	10/20 to 12/20	No Activity
2/20	No Activity	6496 Electronic Deposit Activity.	
3/20	5,000.00	6496 Electronic Deposit Activity.	
4/20	No Activity	6496 Electronic Deposit Activity.	
5/20	No Activity	6496 Electronic Deposit Activity.	
6/20	No Activity	6496 Electronic Deposit Activity.	
7/20	No Activity	6496 Electronic Deposit Activity.	
8/20	No Activity	6496 Electronic Deposit Activity.	
9/20	No Activity	6496 Electronic Deposit Activity.	

Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

TD Bank Records show that in January 2021, Account 0447 appears, and activity between accounts 7068, 6496, 7076, and 0447 begins to occur.

Table 10.

M/Year	6496 Deposit	7076 Deposit	0447 Deposit
1/21	4,875.00		7,000.00
2/21	11,500.00		2,000.00
3/21	11,000.00		
4/21	13,000.00		1,000.00
5/21	8,500.00		
6/21	4,500.00		
7/21	3,500.00		
8/21	4,500.00		
9/21	6,500.00		
10/21	1,500.00	1,250.00	
11/21			
12/21	2,600.00		
1/22	2,000.00		
2/22			
3/22			
4/22		5,000.00	
5/22	7,500.00		
6/22	1,852.00	25,000.00	
7/22	4,020.00	5,000.00	
8/22			
9/22			
10/22			



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

11/22		5,000.00	(5,000.00)
12/22		30.00	
1/23			
2/23	5.00		
3/23	1.00		
4/23	5.00		
5/23	8,300.00	3,000.00	
6/23	2,902.00	100.00	
7/23	6,570.00	3,150.00	
8/23	3,730.00		(4,310.00)
Subtotal	115,176.00	47,530.00	10,000.00
Grand Total	\$115,176.00	\$47,530.00	\$10,000

TD BANK EXPANDED SEARCH WARRANT:

On February 3, 2025, on the basis of the foregoing factual information, Detective Thomas Goggin obtained a Search Warrant for TD Bank for records, documents and/or data pertaining or relating to TD Bank Account No. *****6496 (full account number is set forth on the attached Confidential Form as FAN 4), TD Bank Account No. *****0447 (full account number is set forth on the attached Confidential Information Form as FAN 5), TD Bank Account No. *****1028 (full account number is set forth on the attached Confidential Information Form as FAN 6), and TD Bank Account No.***** 1531, (full account number is set forth on the attached Confidential Information Form as FAN 7). The requested records were received on February 13, 2025, and reviewed as part of this ongoing investigation.

TD Account ***6496 Michael Sangemino Law Office.**

With regard to TD Bank Account*****6496, Detective Goggin reviewed what TD Bank produced pursuant to the search warrant and noted the following relevant information. TD Bank Account *****6496 is a YES Checking Account in the name of Michael J Sangemino -- the account was opened on January 24, 2009, by Mr. Sangemino. The TD Bank Signature card contains the business mailing address of 7234 Lancaster Park, Hockessin, DE, 19707, along with the caption "LAW OFFICE OF MICHAEL J SANGEM [SIC]." The Date of Birth and Social Security Number for Michael Sangemino along with his Signature can be found on this document. Detective Goggin previously conducted a search of Driver



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

License Records and confirmed the biographical information on the account record matches the Driver Licensing Records for Michael Sangemino in the State of Delaware (full Driver License and Social Security numbers are set forth in the attached Confidential Information Form as DLN1 and SSN1 respectively).

TD Account***0447 Joint Account John and Michael Sangemino.**

With regard to TD Bank Account*****0447, Detective Goggin reviewed what TD Bank produced pursuant to the search warrant and noted the following relevant information. TD Bank Account *****0447 is a TD Convenience Checking Account jointly owned by John J. Sangemino and Michael J. Sangemino. The Account was opened on June 1, 2011, by John J. Sangemino and Michael J. Sangemino -- The TD Bank Signature card contains the mailing address of 46 S. Franklyn Ave, Valley Stream, NY, and 7 Elm Avenue, Newark, DE, 19711. The signature of John J. Sangemino dated June 1, 2011, appears at the bottom of the signature card. The signature of Michael J. Sangemino, dated June 1, 2011, is also present at the bottom of the document along with the Date of Birth and Social Security Number for Michael J Sangemino. Detective Goggin previously confirmed the biographical information and home address matches Driver Licensing Records for Michael Sangemino in the State of Delaware.

TD Account ***1028 Michelle Fisher.**

With regard to TD Account *****1028, Detective Goggin reviewed what TD Bank produced pursuant to the search warrant and noted the following relevant information. TD Bank Account *****0447 is a TD Convenience Checking Account owned by Michelle Lynn Fisher ---The account was opened on October 2, 2017, by Ms. Fisher. The TD Bank Signature card contains the mailing address of 919 Tamara Drive, Smyrna DE 19977. The signature of Michelle Fisher can be found at the bottom of the document along with her Date of Birth and Social Security Number. Detective Goggin conducted a search of Driver License Records and confirmed the biographical information on the account record matches the Driver Licensing Records for Michelle Fisher in the State of Delaware (full Driver License and Social Security numbers are set forth in the attached Confidential Information Form as DLN2 and SSN2 respectively).

TD Account ***1531 Your Services, LLC.**

With regard to *****1531, Detective Goggin reviewed what TD Bank produced pursuant to the search warrant and noted the following relevant information. TD Bank Account *****1531 is a TD Business Convenience Plus Checking Account with a Business name of "YOUR SERVICES, LLC," with a business and legal address of 919 Tamara Drive, Smyrna, DE 19977. The Account was opened on October 2, 2017, by Michelle Fisher, and the account relationship is identified as "Corporation or LLC-w/Signers." The Printed name of the account owner is "MICHELLE LYNN FISHER" and her signature appears at the bottom of the document, along with her Date of Birth and Social Security Number. As previously described, Detective

Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

Goggin conducted a search of Driver License Records and confirmed the biographical information on the account record matches the Driver Licensing Records for Michelle Fisher in the State of Delaware (full Driver License and Social Security numbers are set forth in the attached Confidential Information Form as DLN2 and SSN2 respectively).

Detective Goggin conducted an open records search for the corporate name Your Services, LLC, on the website ("Delaware.Gov") and noted the following observations. Your Services, LLC, is identified by File Number 6534316 with an incorporation date of September 6, 2017. Although Your Services, LLC, is listed as a Limited Liability Company in the State of Delaware, there is no registered agent listed in the record. The Postal Code is listed as 95050. Detective Goggin conducted a search of the U.S. Postal Code and learned the Zip Code 95050 originates to Santa Clara, California.

DETAILED REVIEW OF EXPANDED TD BANK RECORDS:

TD Bank records show the fifty-six (56) previously described checks were deposited into TD IOLTA Trust Account *****7068, in the cumulative amount of \$195,150. TD Bank records show Check #181 in the amount of \$1000.00, and Check #182 in the amount of \$90.00, were deposited into TD Bank Account *****7076. The TD Bank Records confirm Michael Sangemino paid himself \$196,240 from the Estate of Doris Boller.

During the period from July 30, 2020, to January 5, 2021, Sangemino executed a transfer of \$25,830.58 from the *****7076 Account to the *****6496 account via seventeen (17) additional check payments issued to himself.

TD Bank records confirm Sangemino transferred funds between linked TD Bank Accounts through an ("eTransfer") process, which is an electronic fund transfer. Detective Goggin created Table 11 from information provided in the TD Bank records. It serves as a visual representative for the movement of funds, and electronic payments to Chase Bank, Discover Bank, Bank of America, Amazon, Verizon Phone, and Debits to cash.

Table 1.1. Electronic Fund Transfers.

Date	Description	Debit	Credit	Balance
2/04	Discover Bank Prearrange.	338.79		1373.50
2/05	eTransfer Credit Online from CK ****0447		2000.00	3373.50
2/05	eTransfer Credit, Online from ****7076		3200.00	6573.50
2/06	DEBIT	1300.00		5273.50
2/06	eTransfer Debit to ****7076	1200.00		4073.50
2/07	Electronic PMT-WEB BK of Amer Online PMT	100.00		
2/07	Electronic PMT-WEB BK of Amer Oline PMT EPAY	100.00		3813.50



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	
	Michael	Joseph		SANGEMINO

AFFIDAVIT OF PROBABLE CAUSE

2/07	Electronic PMT-WEB Chase Credit Crd EPAY	200.00		3613.50
2/07	Electronic PMT-WEB Chase Credit Crd EPAY	2000.00		1613.50
2/07	Electronic PMT-WEB, Discover E-Payment	1000.00		613.50

Source: TD Bank Statement ****6496 Account Jan 08, 2020-Feb 07, 2020.

Date	Description	Debit	Credit	Balance
2/10	Electronic PMT VZ Wireless	203.17		410.33
2/12	eTransfer Credit from ****7076		1000.00	1410.33
2/13	TD ATM Debit	100.0		1310.33
2/18	Deposit		150.00	1460.33
2/24	TD ATM Debit	40.00		1320.33
2/27	TD ATM Debit	20.00		1300.33
2/25	TD ATM Debit	100.00		1200.33
2/28	Deposit		1500.00	2700.33
2/28	Debit	1000.00		1700.33
3/03	Debit	1000.00		700.33
3/04	ACH Debit Discover Bank Prearrange	338.79		361.54
3/04	eTransfer Credit from ****7076		5000.00	5361.51
3/05	Electronic PMT-WEB Bk of Amer.	100.00		5261.54
3/05	Electronic PMT-WEB BK of Amer.	276.00		4985.54
3/05	Electronic PMT-WEB Chase Credit Crd Epay	500.00		4485.54
3/05	Electronic PMT-WEB Chase Credit Crd Epay	2000.00		2485.54
3/05	Electronic PMT-WEB Discover E-Payment	1000		1485.54
3/5	ATM Debit	80.00		1405.54
3/06	Electronic PMT Web VZ Wireless	184.01		1221.53
3/06	Electronic PMT WEB AMZ Storecard	212.07		1009.46

Source: TD Bank Statement ****6496 Account Feb 08, 2020-Mar 07, 2020.

CASH AP PAYMENTS USING THE *****6496 ACCOUNT:

TD Bank Records show the *****6496 Account was used to make Cash App Payments. Detective Goggin is aware that Cash App is mobile phone application that allows users to send and receive money. It is a peer-to-peer method of payment.

TD Bank Records show that on March 31, 2020, an initial CASH APP Debit was recorded for the amount of \$1.00, and described in the bank statement as a "DEBIT CARD PURCHASE AUT 033020 VISA DDA PUR CASH APP MICHAEL SA." From Detective Goggin's experience, this appears to be a payment by the account owner to himself. This enables the account owner to confirm the payment application is working.

What followed on March 31, 2020, is a \$100 Cash App payment, "DEBIT CARD PURCHASE*****54001992776 AUT 030722 VISA DDA PUR CASH APP YA GURL." Detective Goggin inspected the entire record and identified one hundred and twenty-three (123) payments to Cash App



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	
	Michael	Joseph	SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Account Name, "YA GURL" for the period of March 31, 2020, to September 28, 2022. Total Paid to YA GURL: \$89,360.00.

Table 12. Cash App Payments.

Source of Funds	Cash App Account Name	Amount
6496 Account	YA GURL	89,360.00
6496 Account	Barbara	16,050.00
6496 Account	Serenityan	13,130.00
6496 Account	Sarah20202	12,475.00
6496 Account	Michelle	4,450.00
6496 Account	Boss Chic	2,000.00
6496 Account	Gabi	990.00
6496 Account	Ruby	895.00
6496 Account	Jaquline	250.00
6496 Account	Trisha	150.00
6496 Account	Molly	150.00
6496 Account	Amy Kitty	140.00
6496 Account	Summer	100.00
6496 Account	Marissa Di.	50.00
6496 Account	Rebecca	25.00
6496 Account	Autumn SAI	20.00
6496 Account	Amber	20.00
	Total	\$140,255.00

TD Bank Records confirm that payments from Michael Sangemino were received and deposited into TD Bank Account*****1531 and TD Bank Account*****1028, which are both owned and controlled by Michelle Fisher.

On February 9, 2025, Detective Goggin obtained a search warrant for Bank of New York Mellon ("BNY Mellon") records, documents and/or data pertaining or relating to BNY Mellon Account No. *****1016 (full account number is set forth on the attached Confidential Information Form as FAN 8), Account holder as "ESTATE OF DORIS BOLLER, MICHAEL J. SANGEMINO EXECUTOR." Records have been received from BNY Mellon, and Detective Goggin has reviewed them as part of this ongoing investigation.

Included in what BNY Mellon has provided is a copy of both sides of a check written on a Pershing A BNY Mellon Company account dated June 18, 2021 made payable to "Estate of Doris J. Boller Michael J Sangemino Executor 933 S. High St Ste A 1st Floor North West Chester, PA 19382-5400". The check is in the amount of \$13.93. On the backside of the check is a signature endorsement and a handwritten thirteen (13) digit number ending in 6559. This number matches the account number for the BB&T Boller Estate account. Also included are images of an incomplete set of checks written on BNY Mellon Account No. *****1016 with an account holder of "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 7 GREAT VALLEY PARKWAY SUITE 290 MALVERN PA 19355". Also, a series of bank



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

statements ending in the year 2021 for a managed brokerage account with an account number of ***-**5103 (which appears to be connected to *****1016) as well as two account holder records, one an affidavit of domicile dated September 12, 2016 signed and sworn to by Michael J. Sangemino, with an address of "7 Great Valley Pkwy, Ste 290 Malvern", notarized by Jessica G. Sbarbaro, a notary in West Goshen Township, Chester County, Pennsylvania, in which he deposed and said that he is administrator or executor of the Estate of Doris J. Boller, the other a Corestone Account Application in which "Estate of Doris J. Boller" is identified as "Account Title" and the Account Number is ***-**5103. The application is signed by Michael J. Sangemino, the date appears to be 9/16/17, and Mr. Sangemino's Social Security Number and date of birth appear on the document. Also, a notification from BNY Mellon/Pershing addressed to "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 933 S. HIGH ST STE A 1ST FLOOR NORTH WEST CHESTER PA 19382-5400" DATED July 12, 2018.

The checks for which BNY Mellon has provided images include the following checks - -

Check #130 This check is dated June 1, 2018, is made payable to Michael Sangemino, is in the amount of \$4,000, has written on the memo line "EXEC COMM". On the backside is a signature endorsement and a ten (10) digit account number *****6496.

Check #135 This check is dated June 4, 2018, is made payable to Kendal at Longwood, is in the amount of \$150,000, and has written on the memo line "Partial Dist". On the back side is printed "For Deposit Only Kendal Crosslands Communities under which is a ten (10) digit number ending in 1363 which presumably is a Kendal bank account number.

Check #134 This check is dated June 4, 2018, is made payable to McDaniel College, is in the amount of \$150,000, and has written on the memo line "Partial Dist". On the backside is stamped "Pay to the Order Of BB&T MD Westminster MD 21157 For Deposit Only McDaniel College (AS)".

Check #136 This check is dated June 12, 2018, is made payable to Michael J. Sangemino, is in the amount of \$4,000, and nothing is written on the memo line.

Check # 138 This check is dated June 13, 2018, is made payable to Michael Sangemino, is in the amount of \$500, and nothing is written on the memo line. On the backside is a signature endorsement and handwritten a ten (10) digit number ending in 6496.

Check #131 This check is dated June 1, 2018, is made payable to Jennifer Nash, is in the amount of \$8,000, and written on the memo line is "ATTY FEES".

Check #133 This check is dated June 4, 2018, is made payable to Janet E. Heins, is in the amount of \$150,000, and written on the memo line is "Partial Dist".



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

The chronologically earliest bank statement provided by BNY Mellon for account number ***-**5103 is for the statement period of October 1, 2016 to October 31, 2016, and the beginning balance is \$1,002,200.69. The accountholder is "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 7 GREAT VALLEY PARKWAY SUITE 290 MALVERN PA 19355-1425". A bank statement for this account for the statement period of March 1, 2018 to March 31, 2018 shows the accountholder to be "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 7 GREAT VALLEY PARKWAY SUITE 290 MALVERN PA 19355-1425", with a beginning balance of \$791,266.33. However, a bank statement for this account for the statement period of April 1, 2018 to April 30, 2018 shows the accountholder to be "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 933 S. HIGH STREET 1ST FLOOR NORTH WEST CHESTER PA 19382-5400", with a beginning balance of \$792,417.31. For the remainder of 2018, the accountholder remains "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 933 S. HIGH STREET 1ST FLOOR NORTH WEST CHESTER PA 19382-5400", except that "STE A" is added to the accountholder address.

The bank statement for account number ***-**5103 for the statement period of November 1, 2019 to November 30, 2019, accountholder "ESTATE OF DORIS J BOLLER MICHAEL J SANGEMINO EXECUTOR 933 S. HIGH STREET STE A 1ST FLOOR NORTH WEST CHESTER PA 19382-5400" shows a beginning balance of \$173,130.79 and an ending balance of \$13.93. The investment advisor is identified as Patricia Clark Brennan with a phone number of (610)429-9050. This bank statement references an Asset Management Check 0140 in the amount of \$173,130.79 and a withdrawal of \$173,130.79, which correspond with Check No. 140, written on a BNY Mellon Corestone account, deposited into the BB&T Boller Estate account on November 12, 2019. The withdrawal from ***-**5103 of \$173,130.79 brought the account balance to \$0.00, cleaning out the account, but because \$13.93 in interest was paid at or about the same time, the ending balance for the account on December 31, 2019 was \$13.93. The amount of \$13.93 corresponds to the June 18, 2021 check, mentioned above, made payable to "Estate of Doris J. Boller Michael J Sangemino Executor 933 S. High St Ste A 1st Floor North West Chester, PA 19382-5400", which Mr. Sangemino also deposited into the BB&T account.

CONCLUSION AND REQUEST FOR AN ARREST WARRANT:

Defendant Michael Sangemino stole \$196,240 from the Estate of Doris Boller, and converted the money to personal use. Sangemino committed forgeries and filtered nearly all of the money he stole through his attorney IOLTA trust account to conceal the nature and source of the money. Based on all of the foregoing, there is probable cause to charge the defendant with the following criminal offenses --

Theft by Failure to Make Required Disposition of Funds Received, 18 Pa.C.S. Section 3927(a);

Theft by Unlawful Taking, 18 Pa.C.S. Section 3921(a);

Receiving Stolen Property, 18 Pa.C.S. Section 3925;



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646

Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO
----------------	-------------------	-------------------	--------------------

AFFIDAVIT OF PROBABLE CAUSE

Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(1);

Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(2);

Forgery, 18 Pa.C.S. Section 4101(a)(2);

Forgery, 18 Pa.C.S. Section 4101(a)(3).

Specific counts are as follows - -

Count 1 - - Theft by Failure to Make Required Disposition of Funds Received, 18 Pa.C.S. Section 3927(a), graded as Felony of 2nd Degree

September 1, 2020 to September 1, 2021 \$127,200

Count 2 - - Theft by Unlawful Taking, 18 Pa.C.S. Section 3921(a), graded as Felony of 2nd Degree

September 1, 2020 to September 1, 2021 \$127,200

Count 3 - - Receiving Stolen Property, 18 Pa.C.S. Section 3925, graded as Felony of 2nd Degree

September 1, 2020 to September 1, 2021 \$127,200

Count 4 - - Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(1), graded as Felony of 1st Degree

September 1, 2020 to September 1, 2021

Count 5 - - Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(2), graded as Felony of 1st Degree

September 1, 2020 to September 1, 2021

Count 6 - - Theft by Failure to Make Required Disposition of Funds Received, 18 Pa.C.S. Section 3927(a), graded as Felony of 3rd Degree

April 18, 2022 to July 27, 2022 \$46,500

Count 7 - - Theft by Unlawful Taking, 18 Pa.C.S. Section 3921(a), graded as Felony of 3rd Degree

April 18, 2022 to July 27, 2022 \$46,500



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First:	Middle:	Last:	
	Michael	Joseph	SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

Count 8 -- Receiving Stolen Property, 18 Pa.C.S. Section 3925, graded as Felony of 3rd Degree

April 18, 2022 to July 27, 2022 \$46,500

Count 9 -- Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(1), graded as Felony of 1st Degree

April 18, 2022 to July 27, 2022

Count 10 -- Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(2), graded as Felony of 1st Degree

April 18, 2022 to July 27, 2022

Count 11 -- Forgery, 18 Pa.C.S. Section 4101(a)(2), graded as Felony of 3rd Degree

In or about December, 2022

Count 12 -- Forgery, 18 Pa.C.S. Section 4101(a)(3), graded as Felony of 3rd Degree

In or about December, 2022

Count 13 -- Theft by Failure to Make Required Disposition of Funds Received, 18 Pa.C.S. Section 3927(a), graded as Misdemeanor of 1st Degree

October 24, 2022 to February 16, 2023 \$1,090

Count 14 -- Theft by Unlawful Taking, 18 Pa.C.S. Section 3921(a), graded as Misdemeanor of 1st Degree

October 24, 2022 to February 16, 2023 \$1,090

Count 15 -- Receiving Stolen Property, 18 Pa.C.S. Section 3925, graded as Misdemeanor of 1st Degree

October 24, 2022 to February 16, 2023 \$1,090

Count 16 -- Theft by Failure to Make Required Disposition of Funds Received, 18 Pa.C.S. Section 3927(a), graded as Felony of 3rd Degree

November 12, 2019 to December 9, 2019 \$17,000

Count 17 -- Dealing in Proceeds of Unlawful Activity, 18 Pa.C.S. Section 5111(a)(2), graded as Felony of 1st Degree

November 12, 2019 to December 9, 2019



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
				CC-24-01646
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	

AFFIDAVIT OF PROBABLE CAUSE

With regard to Count 16 and Count 17, Detective Goggin obtained from Truist on December 4, 2024 the BB&T records showing the checks Michael J. Sangemino wrote to himself on the BB&T Boller Estate account, dated November 12, 2019, December 4, 2019 and December 9, 2019 respectively, in the respective amounts of \$3,000, \$10,000, and \$4,000 and, therefore, pursuant to 42 Pa.C.S Section 5552(c), had one year from December 4, 2024 within which to timely charge Michael J. Sangemino.

Jurisdiction in Chester County, Pennsylvania is based upon a number of factors, including the following - -

- (1) Doris J. Boller resided at 440 Kendal Drive, Kennett Square, PA, which is in Kennett Township, Chester County, Pennsylvania, at the time of her death, and her will identified her as domiciled in the Commonwealth of Pennsylvania;
- (2) Because Ms. Boller was a Chester County, Pennsylvania resident at the time of her death, administration of her estate was required by law to take place in Chester County, Pennsylvania;
- (3) Michael J. Sangemino, the defendant, was granted letters testamentary by the Register of Wills of Chester County, Pennsylvania, at the Chester County Justice Center, 201 West Market Street, West Chester, PA 19380, which is located in Chester County, Pennsylvania, and, therefore, defendant Sangemino's fiduciary and legal obligations, as Executor of the Estate of Doris J. Boller, Deceased, arose and were established in Chester County, Pennsylvania;
- (4) The Boller Estate assets were originally put by Michael J. Sangemino, the defendant, into an Executor account he established with BNY Mellon, using the address of 7 Great Valley Parkway, Suite 290, Malvern, PA 19355, which is located in East Whiteland Township, Chester County, Pennsylvania;
- (5) When in November, 2019 he moved what remained of the Boller Estate assets from the BNY Mellon Executor account to the BB&T Boller Estate account, Michael J. Sangemino, the defendant, was using the address of 933 South High Street, Suite A, 1st Floor North, West Chester, PA 19382-5400, which is located in the Borough of West Chester, Chester County, Pennsylvania;
- (6) The address Michael J. Sangemino used for the BB&T Boller Estate account was the 7 Great Valley Parkway, Malvern address;
- (7) The bank account into which Michael J. Sangemino, the defendant, funneled most of the \$196,240 he stole from the Boller Estate was a Pennsylvania IOLTA trust account and, therefore, was located in the Commonwealth of Pennsylvania;
- (8) The address Michael J. Sangemino, the defendant, used for the Pennsylvania IOLTA trust account was the 7 Great Valley Parkway, Malvern address;
- (9) The bank account into which Michael J. Sangemino, the defendant, funneled the remainder of the money he stole from the Boller Estate was an attorney account which he maintained as a Pennsylvania attorney and, therefore, was located in the Commonwealth of Pennsylvania;



Docket Number:	Date Filed	OTN/LiveScan Number	Complaint :	Incident Number:
Defendant Name	First: Michael	Middle: Joseph	Last: SANGEMINO	CC-24-01646

AFFIDAVIT OF PROBABLE CAUSE

(10) The address Michael J. Sangemino, the defendant, used for his attorney account was the 7 Great Valley Parkway, Malvern address;

(11) The two forgeries Michael J. Sangemino provided to and uttered through his authorized agent and lawyer, Jennifer Nash, a Chester County, Pennsylvania attorney, were uttered to the Pennsylvania Office of Attorney General, located in the City of Philadelphia, which is in Philadelphia County, Pennsylvania.

ME
7/25

I, Detective THOMAS GOGGIN, BEING DULY SWORN ACCORDING TO 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.

Thomas Goggin

(Signature of Affiant)

Sworn to me and subscribed before me this 24 day of June,

4/29/25 Date mgz, Magisterial District Judge
My commission expires first Monday of January, 2025



Attachment C

COMMONWEALTH OF PENNSYLVANIA

v.

Michael Sangemino

: IN THE COURT OF COMMON PLEAS
 :
 : CHESTER COUNTY, PENNSYLVANIA
 :
 : CRIMINAL ACTION
 :
 : NO. 2181-25

GUILTY PLEA COLLOQUYDEFENDANT INFORMATION

- I am known by the following other names: N/A
- I am 59 years of age today.
- I completed 19 years in school.
- I can read, write and understand the English language. YES NO

If no, I have had an opportunity to have this document translated orally and/or in writing to my native language. N/A YES NO

The defendant enters a plea of guilty to the following crimes:

CRIME: Theft by Failure to Make Required Disp of Funds
 Info.# 2181-25 Count# 1, 6, 10, 16 Statute: 18 Pa CS 3927
 Maximum Sentence: 7 years Grading: F3 Maximum Fine: \$15,000
 Elements: A person who obtains property subject to a known legal obligation, to make specified payment is guilty of theft if he intentionally deals w/ the property obtained as his own

CRIME: Dealing in Proceeds of Unlawful Activities
 Info.# 2181-25 Count# 5, 17, 10 Statute: 18 Pa CS 5111(a)(2)
 Maximum Sentence: 20 years Grading: F1 Maximum Fine: \$100,000
 Elements: Person conducts a financial transaction with knowledge that the property involved represents the proceeds of unlawful activity w/ the intent to disguise the transaction

CRIME: Forgery
 Info.# 2181-25 Count# 11 Statute: 18 Pa CS 4101(a)(2)
 Maximum Sentence: 7 years Grading: F3 Maximum Fine: \$15,000
 Elements: with the intent to defraud or injure anyone makes any writing so that it purports to be the act of another who did not authorize it

CRIME: Theft by Failure to Make Reg Disp of Funds

Info.# 2181-25 Count# 1 Statute: 18 Pa CS 3927

Maximum Sentence: 10 years Grading: F2 Maximum Fine: \$25,000

Elements: Person retains property subject to known legal Disp
to make specific payment & doesn't make it

CRIME: Theft by Failure to Make Reg Disp of Funds

Info.# 2181-25 Count# 13 Statute: 18 Pa CS 3927

Maximum Sentence: 5 years Grading: M1 Maximum Fine: \$10,000

Elements: Person retains prop subject to known legal Disp
to make specific payment & doesn't make it

CRIME: _____

Info.# _____ Count# _____ Statute: _____

Maximum Sentence: _____ Grading: _____ Maximum Fine: _____

Elements: _____

In support of the plea, the defendant admits to the following facts:

On or about 10/12/16 b2/16 to Def did obtain Funds in the amount of \$190,340.00 which not turned to - he did forge checks of it (By your endorsement As checker) victim & misappropriated these funds to use for his own purpose in checker cash PK

DA ym to provide copy of recitation of facts feed into record. AS 10/18/25

All pending pre-trial motions filed by the defendant are withdrawn. Any outstanding charges of the above-referenced information number(s) not disposed of herein, are withdrawn. Any related outstanding bench warrants are quashed.

Naile Gay
Defendant

On September 7, 2016, the defendant, Michael Joseph Sangemino, then an attorney licensed to practice law in the Commonwealth of Pennsylvania, appeared before the Chester County Register of Wills in the Chester County Justice Center, 201 West Market Street, West Chester, Chester County, Pennsylvania, and, pursuant to his petition for grant of letters testamentary with regard to the Estate of Doris Jean Boller, Deceased, was granted letters testamentary to serve as Executor of Ms. Boller's Estate. Doris Jean Boller, a resident of Chester County, Pennsylvania at the time of her death on August 28, 2016, had, pursuant to her last will and testament, appointed defendant Sangemino's law partner to serve as the Executor of her Estate and defendant Sangemino as alternative Executor in the event that the law partner pre-deceased her or became unable or unwilling. In fact, the law partner pre-deceased Ms. Boller, setting the table for defendant Sangemino's petition. When he petitioned the Register of Wills for letters testamentary, and when the Register of Wills granted him letters testamentary, defendant Sangemino, an experienced estate attorney, fully understood that an Executor of an Estate was a fiduciary and that, as Executor of Ms. Boller's Estate, he owed the Boller Estate the fiduciary duty to act first and foremost in its interests and the interests of its beneficiaries, not his own. Pursuant to Ms. Boller's last will and testament, four residuary beneficiaries were named: (1) Janet E. Heins (Ms. Boller's sister); (2) John R. Boller (Ms. Boller's brother); (3) McDaniel College; and (4) Kendall at Longwood. Because McDaniel College and Kendall at Longwood were charitable organizations, oversight by the Pennsylvania Office of the Attorney General of the administration of the Boller Estate was required by law, as such administration related to the charitable organizations.

As Executor of the Estate of Doris Jean Boller, Deceased, defendant Sangemino opened two separate executor accounts, one with Bank of New York Mellon, the other with BB&T (Branch Bank & Trust). The Bank of New York Mellon executor account was an investment account; the BB&T account was an executor checking account. The bulk of the Estate's assets he put into the Bank of New York Mellon account. However, on November 12, 2019, defendant Sangemino transferred \$173,130.79 from the Bank of New York Mellon executor account into the BB&T executor account, effectively depleting the Bank of New York Mellon account. Two days later, on November 14, 2019, Sangemino deposited into the BB&T account a Pennsylvania Department of Revenue check in the amount of \$15,050.01 which was a refund to the Boller Estate for overpayment of Pennsylvania Inheritance Tax. Thereafter, he wrote a total of fifty-eight (58) checks on the Boller Estate BB&T executor account, all to himself, totaling \$196,240, ultimately leaving an account balance of \$1.38. The majority of the checks he wrote to himself he deposited into his law firm's IOLTA (Interest on Lawyers Trust Account) account and, then, transferred from the IOLTA account the Boller Estate funds he had stolen to either his law firm's operating account or one of his personal bank accounts. He used his lawyer's trust account as a conduit of Boller Estate funds which he was embezzling to conceal what he was doing, to give what he was doing an appearance of propriety.

On September 17, 2021, Jennifer Nash, defendant Sangemino's attorney in his capacity as Executor of the Estate of Doris Jean Boller, Deceased, emailed Pamela Fingerhut, Deputy Attorney General, Pennsylvania Office of the Attorney General, providing DAG Fingerhut with an informal accounting with the following proposed final distributions to beneficiaries - -

TO: Janet E. Heins	\$49,479.53
--------------------	-------------

TO: John R. Boller	\$49,479.53
TO: McDaniel College	\$49,479.53
TO: Kendall at Longwood	\$49,479.52
TOTAL	\$197,918.11

On March 22, 2022, Attorney Nash emailed DAG Fingerhut, “Attached are copies of the final distribution checks that are going out today via priority mail”. What Attorney Nash attached to her email to DAG Fingerhut were images of four (4) checks which defendant Sangemino had written out and provided to Attorney Nash which, by appearances, were the proposed distribution checks, written on the BB&T executor account, to Ms. Heins, Mr. Boller, McDaniel College, and Kendall at Longwood, to which Nash had made reference in her earlier email to DAG Fingerhut. In fact, the balance on the BB&T executor account in September, 2021 was \$47,591.38 and remained the same through April, 2022. These checks were never sent to Ms. Heins, Mr. Boller, McDaniel College or Kendall at Longwood because the balance on the BB&T executor account was over \$150,000 short, because defendant Sangemino had embezzled the amount of the shortfall. On December 12, 2022, Attorney Nash emailed Justin Royer of the Office of the Attorney General, stating, in part, “I have also attached copies of the final distribution cancelled checks to the charitable beneficiaries for your records . . .” What Attorney Nash characterized as “copies of the final distribution cancelled checks to the charitable beneficiaries” had been provided to her by defendant Sangemino to be provided to the Office of the Attorney General, and were forged by Sangemino. What was forged by Sangemino were the endorsements on the back sides of the checks to make it look like the checks had been negotiated by McDaniel College and Kendall at Longwood when, in fact, the checks had not even been sent to the charitable beneficiaries.

CHECK ONE:

This is an OPEN PLEA OF GUILTY to the crime(s) set forth on the previous page(s). There is no plea bargain or other agreement relating to the plea except as stated below.

This plea is part of a PLEA AGREEMENT. If the Court accepts this agreement, the sentence(s) will be set forth below.

NEGOTIATED SENTENCE:

Information No.: _____ **Count No.:** _____ **Charge:** _____

Imprisonment: _____ Probation: _____

Probation on THIS count is concurrent with / consecutive to Parole on THIS count (if applicable).

Mandatory Minimum Sentence: YES NO

Credit for Time Served: _____ Re-entry/good time: YES NO

Costs, plus \$ _____ fine. Restitution: \$ _____ is ordered as a direct sentence, payable to _____.

The sentence on THIS count is concurrent with / consecutive to _____.

Check applicable conditions: DNA Drug/Alcohol Evaluation w/recommended treatment

MH Evaluation w/rec treatment No (criminal) contact with _____ ACT 79

42 § 9718.5 & 61 § 6137.2 Mandatory Probation: _____ 3 years _____ 1 year consecutive to SCI aggregate sentence

Other Conditions: _____

Information No.: _____ **Count No.:** _____ **Charge:** _____

Imprisonment: _____ Probation: _____

Probation on THIS count is concurrent with / consecutive to Parole on THIS count (if applicable).

Mandatory Minimum Sentence: YES NO

Credit for Time Served: _____ Re-entry/good time: YES NO

Costs, plus \$ _____ fine. Restitution: \$ _____ is ordered as a direct sentence, payable to _____.

The sentence on THIS count is concurrent with / consecutive to _____.

Check applicable conditions: DNA Drug/Alcohol Evaluation w/recommended treatment

MH Evaluation w/rec treatment No (criminal) contact with _____ ACT 79

42 § 9718.5 & 61 § 6137.2 Mandatory Probation: _____ 3 years _____ 1 year consecutive to SCI aggregate sentence

Other Conditions: _____

Defendant

NEGOTIATED SENTENCE (continued from page 3):

Information No.: _____ **Count No.:** _____ **Charge:** _____

Imprisonment: _____ Probation: _____

Probation on THIS count is concurrent with / consecutive to Parole on THIS count (if applicable).

Mandatory Minimum Sentence: YES NO

Credit for Time Served: _____ Re-entry/good time: YES NO

Costs, plus \$ _____ fine. Restitution: \$ _____ is ordered as a direct sentence, payable to _____.

The sentence on THIS count is concurrent with / consecutive to _____.

Check applicable conditions: DNA Drug/Alcohol Evaluation w/recommended treatment

MH Evaluation w/rec treatment No (criminal) contact with _____ ACT 79

42 § 9718.5 & 61 § 6137.2 Mandatory Probation: _____ 3 years _____ 1 year consecutive to SCI aggregate sentence

Other Conditions: _____

Information No.: _____ **Count No.:** _____ **Charge:** _____

Imprisonment: _____ Probation: _____

Probation on THIS count is concurrent with / consecutive to Parole on THIS count (if applicable).

Mandatory Minimum Sentence: YES NO

Credit for Time Served: _____ Re-entry/good time: YES NO

Costs, plus \$ _____ fine. Restitution: \$ _____ is ordered as a direct sentence, payable to _____.

The sentence on THIS count is concurrent with / consecutive to _____.

Check applicable conditions: DNA Drug/Alcohol Evaluation w/recommended treatment

MH Evaluation w/rec treatment No (criminal) contact with _____ ACT 79

42 § 9718.5 & 61 § 6137.2 Mandatory Probation: _____ 3 years _____ 1 year consecutive to SCI aggregate sentence

Other Conditions: _____

Defendant

NEGOTIATED SENTENCE (continued from page 4):

Information No.: _____ **Count No.:** _____ **Charge:** _____

Imprisonment: _____ Probation: _____

Probation on THIS count is concurrent with / consecutive to Parole on THIS count (if applicable).

Mandatory Minimum Sentence: YES NO

Credit for Time Served: _____ Re-entry/good time: YES NO

Costs, plus \$ _____ fine. Restitution: \$ _____ is ordered as a direct sentence, payable to _____.

The sentence on THIS count is concurrent with / consecutive to _____.

Check applicable conditions: DNA Drug/Alcohol Evaluation w/recommended treatment

MH Evaluation w/rec treatment No (criminal) contact with _____ ACT 79

42 § 9718.5 & 61 § 6137.2 Mandatory Probation: _____ 3 years _____ 1 year consecutive to SCI aggregate sentence

Other Conditions: _____

Information No.: _____ **Count No.:** _____ **Charge:** _____

Imprisonment: _____ Probation: _____

Probation on THIS count is concurrent with / consecutive to Parole on THIS count (if applicable).

Mandatory Minimum Sentence: YES NO

Credit for Time Served: _____ Re-entry/good time: YES NO

Costs, plus \$ _____ fine. Restitution: \$ _____ is ordered as a direct sentence, payable to _____.

The sentence on THIS count is concurrent with / consecutive to _____.

Check applicable conditions: DNA Drug/Alcohol Evaluation w/recommended treatment

MH Evaluation w/rec treatment No (criminal) contact with _____ ACT 79

42 § 9718.5 & 61 § 6137.2 Mandatory Probation: _____ 3 years _____ 1 year consecutive to SCI aggregate sentence

Other Conditions: _____

Assistant District Attorney

12/18/25

Date

Defendant

Attorney for Defendant

PUT YOUR INITIALS AFTER EACH ITEM YOU UNDERSTAND AND AGREE TO:

1. I am entering a plea of guilty to the charges set forth above and waiving any defenses and trial rights I may have. MS

2. My lawyer has explained to me the elements of the offense(s), the maximum sentence(s) and, if this is a negotiated plea, the sentence(s) to be imposed. MS

3. There is no physical or mental condition, medication/drugs/alcohol use, or other impairment that is interfering with my ability to understand what I am doing. MS

VOLUNTARINESS OF PLEA:

4. I understand that if I am not a U.S. citizen, a guilty plea may result in action by the federal immigration enforcement agencies and may include deportation. MS

5. I am aware that my plea here today may have other collateral consequences in addition to the sentence imposed, including, but not limited to:

- a. a probation or parole violation, if I am currently under supervision;
- b. a suspension of my automobile operating privileges;
- c. a prohibition of my ability to purchase, own, or possess a firearm;
- d. the requirement that I provide a DNA sample;
- e. a negative impact on any professional license or certification I may hold.

MS

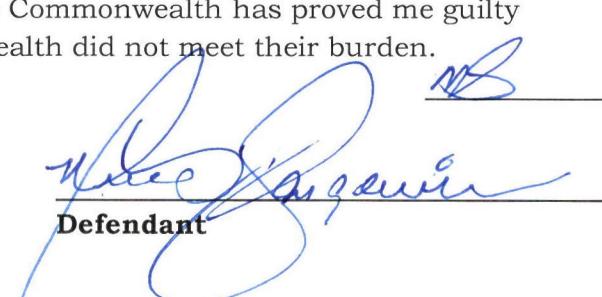
6. No promises have been made to me regarding possible consequences of this plea to persuade me to enter this plea other than what is set forth on Pages 1 through 5 of this form. MS

7. No one has forced or threatened me to require that I plead guilty. MS

TRIAL RIGHTS:

8. I am presumed innocent of the charges against me and that I may pursue any appropriate, meritorious pre-trial matters and proceed to trial. If the Commonwealth cannot prove me guilty beyond a reasonable doubt, the charges would be dismissed. MS

9. The charges in this case entitle me to a jury trial or non-jury trial. If the law entitles me to a jury trial, and I or the Commonwealth elect to proceed with a jury trial, I would be able to participate in the selection of 12 jurors from a larger panel. All 12 jurors would have to unanimously agree to acquit me or find me guilty of the crime(s). A guilty verdict or acquittal on any charge could only be returned if all 12 jurors believe the Commonwealth has proved me guilty beyond a reasonable doubt or if all agree the Commonwealth did not meet their burden. If the jurors cannot agree I would face re-trial. MS


Defendant

10. During any trial, my lawyer would have the right to make opening statements and closing arguments, cross-examine the witnesses brought against me, and to object to evidence presented according to the rules. If I chose not to testify or call witnesses in my own defense, that could not be held against me. 15

11. If I chose to represent myself at trial, I would be required to do all the things that a lawyer would otherwise do for me and be held, by the court, to the standards of a lawyer's representation. MC

12. If I enter a plea in this matter, I give up my right to appeal to the Superior Court on the basis of any pre-trial issues. My rights to appeal after a guilty plea are limited to three (3) grounds:

- a. that this Court did not have jurisdiction (for instance, if the offense occurred in another county); *MS*
- b. that the sentence imposed was illegal;
- c. that the plea was entered either involuntarily or unknowingly.

SENTENCING:

13. I am aware of the maximum sentence(s) and fine(s) that can be imposed for the offense(s) to which I am pleading guilty as they are set forth beginning on Page 1 of this form. ME

14. If I am pleading to more than one offense, or have other cases pending, here or in other jurisdictions, the court(s) may run sentences on any of the charges to which I plead guilty or am convicted, consecutively or concurrently to each other. 

15. In pronouncing a sentence, the Court must consider, BUT IS NOT BOUND BY, the guidelines issued by the Pennsylvania Commission on Sentencing. I have spoken with my attorney about the sentencing process and understand the Commission's recommendation for a sentence in my case. 

16. I may have a right to a pre-sentence investigation which will give the Court a statement of my personal history in the areas of education, criminal history, family history, disabilities, and other general information regarding my plea to aid the judge in sentencing. *[Signature]*

IF WAIVED

17. [FOR PLEA AGREEMENTS ONLY] The Court is not bound by the terms of the proposed negotiated sentence(s) on **Pages 3 through 5** of this form, but if the Court rejects it, I may withdraw my plea of guilty. 

18. [MANDATORY SENTENCES ONLY] The crime of _____, to which I am entering a
plea requires a mandatory minimum sentence of _____,
and/or a mandatory fine of \$ _____. 

Defendant

19. I understand and agree that all the rules of supervision of Chester County Adult Probation and Parole are part of the Court's sentence. I have had the opportunity to read the attached rules and conditions governing probation and parole and will abide by them. NO

POST-SENTENCE AND APPELLATE RIGHTS:

I understand that:

20. I have ten (10) days from the date I am sentenced to file optional motions with this Court for post-sentence relief, such as a motion to withdraw my guilty plea or a motion to modify sentence. I understand that these motions must be in writing and specify the reasons why relief is requested. I also understand that failure to file these optional motions may be a waiver of any rights or issues I could raise on appeal. NO

21. I have the right to the assistance of counsel in filing a post-sentence motion and/or appeal. If I would like to be represented by a lawyer in filing such post-sentence motions, and cannot afford to hire one, I could apply to the Court and a lawyer may be appointed to represent me free of charge. NO

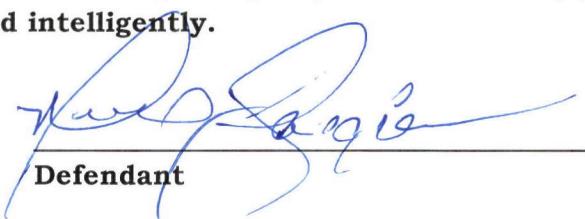
22. If I wish to appeal, I must file an appeal to the Superior Court of Pennsylvania within thirty (30) days of being sentenced, unless the Court vacates the sentence before those thirty (30) days expire, or unless I file an optional post-sentence motion. If a post-sentence motion is denied, I must file an appeal within thirty (30) days of that denial. NO

23. If I cannot afford the costs of an appeal, I may apply to the Court for a waiver of costs. NO

REPRESENTATION OF COUNSEL:

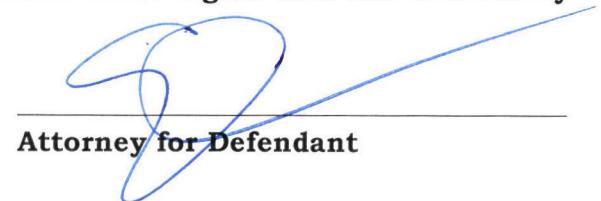
24. I have had enough time to discuss these charges and my options with my lawyer. I am satisfied with their advice, and their representation of me before this Court. NO

I affirm that I have reviewed the above document in its entirety with the help of my lawyer and I understand its full meaning. It is my decision to plead guilty to the offense(s) specified and I am doing so knowingly, voluntarily, and intelligently.



Defendant

As lawyer for the above defendant, I have explained to them their rights with respect to the charges against them. I have also explained the rights set forth in this document. I certify that I am satisfied that the defendant understands these rights and has voluntarily and knowingly chosen to enter a plea of guilty.



Attorney for Defendant

COURT ACTION

The defendant is found to have understandingly completed or participated in the completion of the foregoing guilty plea form, and to have voluntarily and intelligently entered a plea of guilty to the charges described herein.

Defendant's guilty plea(s) is/are accepted.

The foregoing Plea Agreement is approved.

Defendant is sentenced in accordance with the Plea Agreement.

Select one (1) of the following three (3) options:

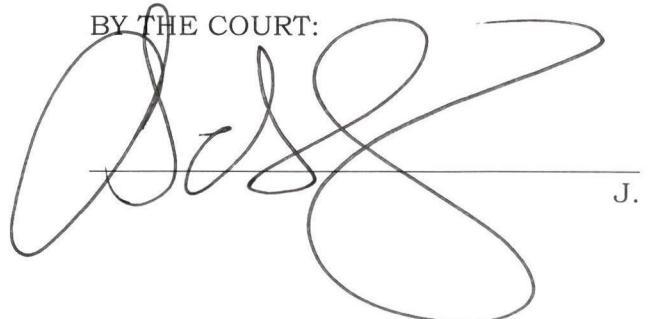
Defendant is not eligible for work release.

Defendant is eligible for work release after _____.

Defendant is eligible for work release at the discretion of the Warden.

Date: 12-18-25

BY THE COURT:

A large, handwritten signature in black ink, appearing to read "J. D. J.", is written over a horizontal line. Above the signature, the text "BY THE COURT:" is written in a smaller, printed font.

**Chester County Court of Common Pleas
Rules and Conditions Governing Probation, Parole & Restrictive Probation**

*Chester County Adult Probation & Parole Department
201 West Market Street, Suite 2100 West Chester, PA 19380
610-344-6290*

I will abide by the following rules and conditions and my specific case plan, unless otherwise ordered:

1. I will comply with all Municipal, County, State and Federal Laws, Ordinances, Court Orders and conduct myself as a good citizen. I will report any arrests or contact with any law enforcement officer to my probation/parole officer within 72 hours.
2. I will report in person or via advanced communication methods as directed by my probation/parole officer (PO). I will abide by any directives given to me by my PO. The responsibility to report falls upon me. If I am not contacted by the Adult Probation/Parole Department within 30 days of my sentence/release, I will contact my assigned PO who is listed at the end of this form.
3. I will sign all releases necessary to further treatment and supervision aims, including permission to review diagnostic and treatment information. I will pay all costs associated with evaluations and treatment.
4. I will submit to witnessed urinalysis, and or breath testing to ensure compliance with supervision. If the results of a urinalysis test are disputed, I have the option of confirming the test for a fee of \$50.00, payable at the time the request is made. If the test is confirmed positive, I may face additional sanctions by the Court. If the test result is negative, I may choose to have the fee reimbursed or applied to my fines and costs. If I attempt to submit a fake or adulterated urine sample per 18 Pa. C.S. § 7509 I may be prosecuted for a misdemeanor of the third degree.
5. I will not use or have in my possession any illegal drugs or controlled substance except as prescribed for me by a licensed medical practitioner. I will not consume alcoholic beverages.
6. If I am ordered by the court to complete a class (Retail Theft, Anger Management, Domestic Violence or have an evaluation (Drug & Alcohol, Mental Health, Sex Offender, or other), I will schedule the class/evaluation within 20 days of my sentence or release from custody, unless otherwise directed by the Court or my Probation Officer.
7. I understand that my residence and living situation must be approved by the Adult Probation/ Parole Department. I understand, I may not change my address without the approval of the Adult Probation/Parole Department. I will permit my PO to visit my residence. I will make every effort to obtain and maintain employment and support my dependents unless engaged in a specific program approved by my PO. In the event that I lose my job or am terminated from a treatment or educational program, I will notify my PO within 72 hours.
8. I acknowledge that I am subject to the warrantless search of my person, property, vehicle or residence and appropriate seizure and disposal of any contraband found. I understand that a search may occur, if it is reasonably suspected that it would yield evidence of a crime or a violation of my supervision.
9. I will obtain advance permission from my PO before leaving the Commonwealth of Pennsylvania. I understand I am not permitted to leave the Commonwealth of Pa without permission. I understand that I will not be permitted to travel for leisure if I owe restitution. Permission to travel will only be granted once all restitution owed is paid in full and I am making regular payments towards my court costs and fines.
10. I will not possess, purchase, receive, sell or transport any firearms (handguns, shotguns, rifles or parts to construct a firearm), ammunition, imitation (look-alike) firearms, explosive devices or any other deadly weapons. I am not permitted to live at any residence where firearms are present.

Initials: Client  PO _____

11. I will associate only with law-abiding persons and must refrain from frequenting unlawful or disreputable places.
12. I will always be truthful and accurate in any written or verbal statement that I make to staff of the Probation/Parole Department and the Court.
13. I will refrain from behavior which threatens or presents a danger to myself or others. I will not annoy or harass any victim of my crime or any witnesses and will not procure anyone else to do so.
14. I will make monthly payments toward fines, costs, and/or restitution, including administrative fees and supervision fees, as directed by the Court and according to my payment plan. I understand that if, for a valid reason, I am unable to make a full scheduled payment, I can stay in compliance by making a partial payment. I am advised that a civil judgment may be placed against me until such time as I have paid in full.
15. I understand that I may be eligible to have supervision fees waived, reduced, or deferred if I meet certain eligibility requirements and that I must submit a written request (Form available from probation officer or on website).
16. I have been advised that I may enter into a Wage Agreement in order to have money automatically deducted from my paycheck and applied towards my fines, costs, and restitution.
17. If my case is transferred to another state for supervision, I will be assessed a non-refundable application fee of \$125.00.
18. Special Conditions: _____

I understand that I will be under the legal supervision of the Court until the expiration of my probation/parole/restrictive probation and that if I violate any of the conditions of my supervision the Chester County Adult Probation & Parole Department has the authority to arrest and detain me and to make recommendations to the Court which may result in the revocation of my probation/parole/restrictive probation and commitment to prison.

In the event of a life-threatening emergency please dial **911**. All other emergencies that require a response from the Adult Probation (APO) Staff that cannot be addressed the following business day please call the **Department of Emergency Services at 610-344-5100** and ask to speak to the APO Representative.

Grievance Procedure: All offender grievances must be submitted in writing to:
Director of Adult Probation and Parole, 201 W. Market Street Suite 2100, PO Box 2746, West Chester, PA 19380-0989. A staff person not directly involved with your case will review the grievance and will provide a written response within ten business days of receipt.

ACKNOWLEDGEMENT OF PROBATIONER/PAROLEE

I have read or have had read to me the terms and conditions of my probation/parole. I fully understand them and agree to abide by and strictly follow them, and I fully understand the penalties involved should I violate them in any manner.

Signature of Officer:

PO#:

Signature of Defendant:

Date:

Assigned Probation Officer:

PO#:

Term Number(s):

12/18/28

CR - 2181-25

CERTIFICATE OF COMPLIANCE

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.

Submitted by: Office of Disciplinary Counsel

Signature: Emily R. Provencher

Name: Emily R. Provencher

Attorney No. (if applicable): 309804