

COMMONWEALTH OF  
PENNSYLVANIA  
COUNTY OF: 09-BUCKS



**POLICE CRIMINAL COMPLAINT**  
**COMMONWEALTH OF PENNSYLVANIA**  
**VS.**

Magisterial District Number: 07-1-04  
MDJ: Hon. Robert L. Wagner, Jr.  
Address: 7325 New Falls Road  
Levittown, PA 19055  
Telephone: (215) 943-9414

**DEFENDANT:**

Christopher

(NAME and ADDRESS):

D.

Kuhn

First Name

Middle Name

Last Name

Gen.

135 Milton Ave.  
Hamilton, NJ 08610

**NCIC Extradition Code Type**

- ☐ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending  
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States ☐ Distance: \_\_\_\_\_  
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition

**DEFENDANT IDENTIFICATION INFORMATION**

Docket Number CR-2017-17 Date Filed 10-3-17 QTN/LesScan Number 7977285 Complaint/Incident Number 2017-5440 SID \_\_\_\_\_ Request Lab Services? ☒ YES ☐ NO

GENDER ☒ Male ☐ Female DOB 10/09/1989 POB , NJ, Add'l DOB \_\_\_\_\_ Co-Defendant(s) ☐  
First Name \_\_\_\_\_ Middle Name \_\_\_\_\_ Last Name \_\_\_\_\_ Gen. \_\_\_\_\_  
AKA \_\_\_\_\_

RACE ☐ White ☐ Asian ☒ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR ☐ GRN (Gray) ☐ RED (Red/Auburn) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☐ BRO (Brown)  
☒ BLK (Black) ☐ ORG (Orange) ☐ WHI (White) ☐ XXX (Unk./Bald) ☐ GRN (Green) ☐ PNK (Pink)  
☐ BLN (Blonde / Strawberry)

EYE COLOR ☐ BLK (Black) ☐ BLU (Blue) ☒ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray)  
☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)

Driver License State NJ License Number K91521248410892 Expires: 10/31/2018 WEIGHT (lbs.) 155

DNA ☐ YES ☒ NO DNA Location \_\_\_\_\_

FBI Number 15621AE8 MNU Number \_\_\_\_\_ Ft. HEIGHT in. 6 04

Defendant Fingerprinted ☐ YES ☒ NO

Fingerprint Classification: \_\_\_\_\_

**DEFENDANT VEHICLE INFORMATION**

Plate # G77CXN State NJ Hazmat ☐ Registration Sticker (MM/YY) \_\_\_\_\_ Comm'l Veh. Ind. ☐ School Veh. ☐ Oth. NCIC Veh. Code \_\_\_\_\_ Reg. same as Def. ☐  
VIN 1J4GL58K07W614931 Year 2007 Make Jeep Model Liberty Style Sports Utility Vehicle Color Gold

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).

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, Phillip Kulan / Daniel J. Doyle  
(Name of the Affiant)

36508A/22 10024079A-118  
(PSP/MP/ETC-Assigned Affiant ID Number & Badge #)

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

PA 0091900  
(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 \_\_\_\_\_

☐ 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 09421 Tullytown Borough  
Exit 4 / Route 13 (Bristol Pike), Levittown, PA 19055 (Subdivision Code) (Place/Political Subdivision)

in 09-Bucks County [ 09 ] on or about Tue - 10/3/2017 12:13 hrs.  
(County Code)

**POLICE CRIMINAL COMPLAINT**

Docket Number: <b>CK-240-17</b>	Date Filed: <b>10-3-17</b>	OTN/LiveScan Number: <b>T 977285-1</b>	Complaint/Incident Number: <b>2017-5440</b>
Defendant Name	First: <b>Christopher</b>	Middle: <b>D.</b>	Last: <b>Kuhn</b>

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 4.

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.)

10-3 2017  
(Date)

(Signature of Affiant)

AND NOW, on this date 10-3-17 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.

07-1-04  
(Magisterial District Court Number)

(Issuing Authority)





## POLICE CRIMINAL COMPLAINT

Docket Number: CR-2017-17	Date Filed: 10-3-17	OTN/LiveScan Number T 977 285-1	Complaint/Incident Number 2017-5440
Defendant Name	First: Christopher	Middle: D.	Last: Kuhn

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate:

(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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input checked="" type="checkbox"/> Lead?	1	2502	(c)	of the	18	1	F1		1
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
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Statute Description (include the name of statute or ordinance):  
Murder of the third degree

Acts of the Accused associated with this Offense:  
CC2502(c) - Murder of the third degree

Murder of the third degree.--All other kinds of murder shall be murder of the third degree. Murder of the third degree is a felony of the first degree. The defendant did, with gross negligence or recklessly, cause the death of another human being, namely John Doe, approximately two years of age, with malice.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	2	3732	(a)	of the	75	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):  
Homicide by Vehicle

Acts of the Accused associated with this Offense:  
VC3732 - Homicide by Vehicle

(a) Offense.--Any person who recklessly or with gross negligence causes the death of another person while engaged in the violation of any law of this Commonwealth or municipal ordinance applying to the operation or use of a vehicle or to the regulation of traffic except section 3802 (relating to driving under influence of alcohol or controlled substance) is guilty of homicide by vehicle, a felony of the third degree, when the violation is the cause of death.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/> Lead?	3	3742.1	(a)	of the	75	1	F3		
Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code		

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (include the name of statute or ordinance):  
Accidents Involving Death or Injury, Not Properly Licensed

Acts of the Accused associated with this Offense:  
VC3742.1 - Accidents Involving Death or injury, Not Properly Licensed

A person whose operating privilege was disqualified, canceled, recalled, revoked or suspended and not restored or who does not hold a valid driver's license and applicable endorsements for the type and class of vehicle being operated commits an offense under this section if the person was the driver of any vehicle and caused an accident resulting in injury or death of any person.



## POLICE CRIMINAL COMPLAINT

Docket Number: CR-210-17	Date Filed: 10-3-17	OTN/LiveScan Number T 977 285-1	Complaint/Incident Number 2017-5440
Defendant Name	First: Christopher	Middle: D.	Last: Kuhn

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate:

(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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	4	3929	A1	of the	18	1	M1		6
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
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Statute Description (include the name of statute or ordinance):  
Retail Theft - Takes possession, carries away, transfers

Acts of the Accused associated with this Offense:  
CC3929A1 - Retail Theft - Takes possession, carries away, transfers

(a) A person is guilty of a retail theft if he:

(1) takes possession of, carries away, transfers or causes to be carried away or transferred, any merchandise displayed, held, stored or offered for sale by any store or other retail mercantile establishment with the intention of depriving the merchant of the possession, use or benefit of such merchandise without paying the full retail value thereof;

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	5	4304	A1	of the	18	1	M1		20
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
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Statute Description (include the name of statute or ordinance):  
Endangering welfare of children.

Acts of the Accused associated with this Offense:  
CC4304A1 - Endangering welfare of children.

(a) Offense defined.--

(1) A parent, guardian or other person supervising the welfare of a child under 18 years of age, or a person that employs or supervises such a person, commits an offense if he knowingly endangers the welfare of the child by violating a duty of care, protection or support.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	6	2705		of the	18	3	M2		4
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
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Statute Description (include the name of statute or ordinance):  
Recklessly Endangering Another Person

Acts of the Accused associated with this Offense:  
CC2705 - Recklessly Endangering Another Person

A person commits a misdemeanor of the second degree if he recklessly engages in conduct which places or may place another person in danger of death or serious bodily injury.



## POLICE CRIMINAL COMPLAINT

Docket Number CR-2017-17	Date Filed 10-3-17	OTN/LiveScan Number T 977 285-1	Complaint/Incident Number 2017-5440
Defendant Name	First: Christopher	Middle: D.	Last: Kuhn

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate:

(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. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	7	3112	A3i	of the	75	1	S		
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
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Statute Description (include the name of statute or ordinance):  
Traffic Control Signals Steady Red Signal

Acts of the Accused associated with this Offense:  
VC3112A3i - Traffic Control Signals Steady Red Signal

(3) Steady red indication.

(i) Vehicular traffic facing a steady red signal alone shall stop at a clearly marked stop line, or if none, before entering the crosswalk on the near side of the intersection, or if none, then before entering the intersection and shall remain standing until an indication to proceed is shown except as provided in subparagraph

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	8	1543	a	of the	75	1	S		
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
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Statute Description (include the name of statute or ordinance):  
Driving While Operating Privilege Is Suspended

Acts of the Accused associated with this Offense:  
VC1543(a) - Driving While Operating Privilege Is Suspended

(a) Except as provided in subsection (b), any person who drives a motor vehicle on any highway or trafficway of this Commonwealth after the commencement of a suspension, revocation or cancellation of the operating privilege and before the operating privilege has been restored is guilty of a summary offense and shall, upon conviction, be sentenced to pay a fine of \$200.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903
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<input type="checkbox"/>	9	3736	A	of the	75	1	S		
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
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Statute Description (include the name of statute or ordinance):  
Reckless Driving

Acts of the Accused associated with this Offense:  
VC3736A - Reckless Driving

(a) Any person who drives any vehicle in willful or wanton disregard for the safety of persons or property is guilty of reckless driving.



## POLICE CRIMINAL COMPLAINT

Docket Number: 01-240-17	Date Filed: 10-3-17	OTN/LiveScan Number T 977 285-1	Complaint/Incident Number 2017-5440
Defendant Name	First: Christopher	Middle: D.	Last: Kuhn

## AFFIDAVIT of PROBABLE CAUSE

Your affiants, Chief Daniel J. Doyle and Sergeant Phillip D. Kulan #22 are Pennsylvania Act 120 Sworn Municipal Police Officers employed by the Tullytown Borough Police department in Bucks County, Pennsylvania. Chief Doyle has been duly sworn since 1997. Sgt. Kulan has been duly sworn since 2007.

On Tuesday, October 3, 2017, at approximately 1213 hours, Tullytown Police were dispatched to the Walmart located at 180 Levittown Parkway, Levittown, Bucks County, Pennsylvania for a retail theft in progress involving a black male, subsequently identified as the defendant, Christopher D. Kuhn, DOB 10/8/1989. According to the Walmart Asset Protection Officer Ronald Cromwell, (APO), Kuhn was observed placing a Vizio sound bar, valued at \$228 into his cart, and walking towards the store exit without attempting to pay for the item.

At the time, Kuhn had a male child with him, approximately two years of age, who was seated in the cart. Once Kuhn passed all points of sale without paying for the sound bar, the APO attempted to stop him. Kuhn told the APO "you can't hold me here" then removed the child from the cart and left the store. Witnesses observed Kuhn walk down the front of the store and into the parking lot of the Firestone Service Center, adjacent to the Walmart.

Witnesses observed Kuhn put the child into the back seat of a Gold SUV, but did not observe the defendant place the child into a child safety seat. Kuhn then placed his sweatshirt over the rear license plate of the SUV, before he got into the vehicle and drive off.

When Tullytown police arrived at the Walmart for the retail theft call, the officer was advised by the LPO that the male retail theft suspect had fled in a gold SUV, leaving the parking lot and travelling southbound on Route 13. Investigation revealed that the suspect was driving a gold in color, 2007 Jeep Wagon bearing NJ registration G77CXN. The responding officer then turned his vehicle around and exited the parking lot, heading southbound on Route 13 in time to observe that a three vehicle crash had just occurred at Route 13 and Exit 4 of the shopping center.

According to witnesses, the gold SUV was driving recklessly, travelling at a high rate of speed through a steady red light at the intersection of Route 13 (SB) and Exit 4 when the suspect vehicle was struck by another SUV entering the intersection. The SUV that struck the fleeing suspect vehicle had a steady green light before it entered the intersection. The vehicle that struck the suspect vehicle clearly had the right of way. The suspect vehicle then flipped and rolled, landing partially onto a third SUV at the intersection, before coming to rest.

After the crash, a witness observed the defendant get out of his SUV and walk over to and look at the child laying on the ground, before he fled on foot.

(Continued on next page)

I, Phillip Kulan, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

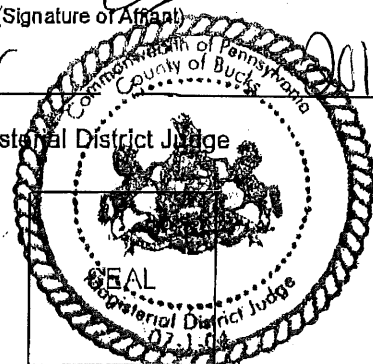
Sworn to me and subscribed before me this 3 day of October

10-3-17 Date

(Signature of Affiant)

, Magisterial District Judge

My commission expires first Monday of January, 2018





# POLICE CRIMINAL COMPLAINT

Doorer Number: CK-940-17	Date Filed: 10-3-17	OTN/LiveScan Number T 977285-1	Complaint/Incident Number 2017-5440
Defendant Name	First: Christopher	Middle: D.	Last: Kuhn

## AFFIDAVIT of PROBABLE CAUSE CONTINUATION

Upon arrival at the crash scene, police were directed towards a black male that had just fled the scene on foot. Police pursued the suspect and took the defendant into custody. Once police apprehended the defendant, they asked him where the baby was, and the defendant stated "back there" indicating the crash scene.

Investigation revealed that the child had been ejected from the defendant's SUV during the crash, and land in the roadway of southbound Route 13, next to the defendant's vehicle. A child safety seat was located in the back of the defendant's gold SUV.

Officer Gotz had arrived on-scene and found an unidentified, unresponsive male, approximately two years of age, laying in the roadway next to the defendant's vehicle. The child was unresponsive, and without a pulse. Officers attempted to revive the child by giving him CPR, until medics arrived. The child was then transported to Lower Bucks Hospital where he was pronounced deceased.

A certified driver's abstract from the State of New Jersey for the defendant was obtained and indicated that Christopher Kuhn's license is suspended.

When the suspect was apprehended, he was placed into the back of a patrol car, where he was non-responsive and uncooperative to police questions regarding the incident or the identity of the child.



762 DX [Signature] 100-467911-18  
(Signature of Affiant)