

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF MONTGOMERY

Magisterial District Number: **38-1-02**

MDJ: Hon. R. EMMETT MADDEN
 117 YORK RD
 SUITE 100-B
 JENKINTOWN PA 19046
 Telephone: (215) 635-1535



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):

SHAIKAN PITTS
 First Name Middle Name Last Name Gen

1415 SHELMIRE ST
PHILADELPHIA PA UNITED STATES 19111

NCIC Extradition Code Type

- | | | | |
|--|---|--|------------------------------------|
| <input checked="" 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 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 CR22-24	Date Filed 03/21/24	OTN/LiveScan Number 1 U1003782-3	Complaint 7595	Incident Number 23-28463	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 7/14/1986	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
AKA	First Name	Middle Name	Last Name	Gen.

RACE White Asian Black Native American Unknown

ETHNICITY Hispanic Non-Hispanic Unknown

HAIR COLOR GRY (Gray) RED (Red/Aubn.) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown)
 BLK (Black) ONG (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)

DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location	WEIGHT (lbs.) 180
FBI Number	MNU Number	
Defendant Fingerprinted: <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT In. 5 10
Fingerprint Classification:		

DEFENDANT VEHICLE INFORMATION

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

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

(The attorney for the Commonwealth may require 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.)

Edward F. McCann, Jr. **Edward F. McCann, Jr.** **3-21-24**
 (Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, **JUSTIN SNEERINGER** **44330 1041**
 (Name of the Affiant) PSP/MPOETC -Assigned Affiant ID Number and Badge #

of **Cheltenham Twp. Police Dept** **PA0460500**
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)

do hereby state: (check appropriate box)

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 **[102] Cheltenham Township**
 (Subdivision Code) (Place-Political Subdivision)

7827 OLD YORK RD ELKINS PARK, PA 19027

in **MONTGOMERY** County [**46**] on or about **Between 11/25/2023 1730 and 11/25/2023 1800**
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR 23-24	Date Filed: 03/21/2024	OTN/LiveScan Number U 1003782-3	Complaint 7595	Incident Number 23-28463
Defendant Name	First: SHAIKAN	Middle:	Last: PITTS	

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered _____ through _____.
- 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.)

JUSTIN SNEERINGER

_____ 3/22/24 10/0 [Signature] #10001
 (Date) (Signature of Affiant)

AND NOW, on this date 22 MAR 24 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.

38-1-02

(Magisterial District Court Number)

[Signature]
 (Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR 22-24	Date Filed: 03/21/2024	OTN/LiveScan Number U 1003782-3	Complaint 7595	Incident Number 23-28463
Defendant Name	First: SHAIKAN	Middle:	Last: PITTS	

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 _____
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<input checked="" type="checkbox"/>	1	3735		of the	PA Vehicle Code	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

UNINT/CAUSE DEATH W/DUI

Acts of the accused associated with this Offense:

PAVC 3735 Homicide by Vehicle While Driving Under Influence

IN THAT, on or about said date, THE DEFENDANT did unintentionally cause the death of another person, namely, LAISHAH HOLLOMAN, as the result of a violation of Vehicle Code, Section 3731, Driving Under the Influence of Alcohol or Controlled Substance, in violation of Section 3735 of the PA Vehicle Code. (75 P.S. 3735 - Felony 2nd)

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 _____
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<input type="checkbox"/>	2	VC3735.1	A	of the	PA Vehicle Code	1	F2		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

AGGRAVATED ASSAULT/DU

Acts of the accused associated with this Offense:

PAVC 3735.1 Aggravated Assault by Vehicle While Driving Under The Influence

IN THAT, on or about said date, THE DEFENDANT, negligently caused serious bodily injury to another person as the result of a violation of Section 3802 which caused the injury, in violation of Section 3735.1 of the PA Vehicle Code. (3735.1 - Fel.2nd)



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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 _____
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<input type="checkbox"/>	3	VC3742.1	(a)	of the	PA Vehicle Code	1	F3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

ACC-DEATH/INJ W/O LICENSE

Acts of the accused associated with this Offense:

PAVC 3742.1(a) Accidents Involving Death or Personal Injury While Not Properly Licensed

IN THAT, on or about said date, THE DEFENDANT, drove, operated and was in actual physical control of a motor vehicle, causing an accident resulting in injury/death to a person while HIS operating privilege at the time of the accident was SUSPENDED and had not been issued a valid drivers license, in violation of Section 3742.1(a) of the PA Vehicle Code. (3742.1(a) - Grading)

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 _____
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<input type="checkbox"/>	4	3736	(a)	of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

RECKLESS DRIVING

Acts of the accused associated with this Offense:

PAVC 3736(a) Reckless Driving

IN THAT, on or about said date, THE DEFENDANT did drive a vehicle in willful or wanton disregard for the safety of persons or property, in violation of Section 3736(a) of the PA Vehicle Code. (75 P.S.3736(a) - Summary)



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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 _____					
<input type="checkbox"/>	5	3802	(d)(3)	of the	PA Vehicle Code	1	M		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

DUI

Acts of the accused associated with this Offense:

PAVC 3802(d)(3) Driving Under the Influence of Alcohol or Controlled Substance - Misd.

On or about said date, THE DEFENDANT, did unlawfully, drive, operate or was in actual physical control of the movement of a vehicle: NISSAN ROGUE bearing PA registration number LHK0433 under any of the following circumstances:

(d)(3) The individual is under the combined influence of alcohol and a drug or a combination of drugs to a degree which impairs the individual's ability to safely drive, operate, or be in actual physical control of the movement of the vehicle.

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 _____					
<input type="checkbox"/>	6	3714	A	of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

CARELESS DRIVING

Acts of the accused associated with this Offense:

PAVC 3714 Careless Driving

IN THAT, on or about said date, THE DEFENDANT did drive said motor vehicle in careless disregard for the safety of persons or property at 7800 BLOCK OF OLD YORK RD by DRIVING WELL IN EXCESS OF THE POSTED SPEED LIMIT CAUSING A FATAL CRASH, in violation of Section 3714 of the PA Vehicle Code. (75P.S. 3714 - Summary)



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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 _____
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<input type="checkbox"/>	7	1543	A	of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

DRIVE UNDER SUSPENSION

Acts of the accused associated with this Offense:

PAVC 1543(a) Driving While Operating Privilege Is Suspended or Revoked

IN THAT, THE DEFENDANT did operate a motor vehicle at a time when his operating privileges had been suspended, revoked, or recalled, in violation of Section 1543(a) of the PA Vehicle Code (75 P.S. 1543(a) - Summary)

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 _____
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<input type="checkbox"/>	8	3361		of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC 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 the statute or ordinance):

SAFE SPEED

Acts of the accused associated with this Offense:

PAVC 3361 Driving Vehicle At Safe Speed

IN THAT, on or about said date, THE DEFENDANT did drive a motor vehicle at a speed greater than was reasonable or prudent for the existing conditions; to-wit: actor did drive said motor vehicle at a speed greater than reasonable or prudent for NORMAL CONDITIONS at 7800 BLOCK OF OLD YORK RD - ELKINS PARK, PA 19027 - CHELTENHAM TOWNSHIP, in violation of Section 3361 of the PA Vehicle Code. (75 P.S. 3361 -Summary)



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Defendant Name	First: SHAIKAN	Middle:	Last: PITTS	

AFFIDAVIT OF PROBABLE CAUSE

On November 25th, 2023, at approximately 5:53pm, Officers with the Cheltenham Township Police Department responded to the area of Old York Rd and Spring Ave, in the Elkins Park section of Cheltenham Township, Montgomery County, Pennsylvania, for a vehicle crash. The crash was reported to have an overturned vehicle, and a person trapped underneath the overturned vehicle. One of the vehicles involved, later confirmed to be the striking vehicle, was a silver 2011 Nissan Rogue (VIN JN8AS5MT6BW568225), bearing PA registration LHK-0433. The on-scene investigation found the Nissan Rogue to be traveling North bound on Old York Rd at a high rate of speed, before colliding with a white Ford van. At the time of the crash, the white Ford van was exiting a private driveway, and crossing Old York Rd. The Nissan Rogue collided with the Ford van at approximately the driver's door, causing the van to enter a spin, and overturn. This violent motion caused the driver of the Ford van to be partially ejected from the driver's side window and become entrapped between the driver's door and the ground. The driver of the Ford van was identified as Laishah Kendra Holloman, DOB 11/10/1990. She was later pronounced deceased on-scene by Cheltenham Township EMS. The operator of the Nissan Rogue, Shaikan Pitts, DOB 7/14/1986, remained on-scene following the crash. He identified himself to Ofc Brett Thomas as the driver of the Nissan Rogue.

An investigation was done at the scene of the crash, a stretch of Old York Rd, in the north bound lanes, on asphalt in a 40mph zone. This stretch of road is flat with no line of sight issues for vehicles traveling north. Physical evidence on the scene showed that the Nissan Rogue, unit 1, did not leave any tire marks, skid marks or any evidence of braking or evasive maneuvering. The speedometer in the Nissan Rogue was frozen at 69mph due to the impact. During the initial interaction with Shaikan Pitts (7/14/1986) on-scene, Ofc Thomas could smell the odor of an alcoholic beverage coming from his breath from 2-3 feet away.

Pitts was taken to Abington Hospital for treatment of injuries sustained in the crash. Ofc Justin Sneeringer with the Cheltenham Township Police later executed a search warrant for the physical blood specimen of Pitts and a warrant for the medical records. A subsequent search warrant was executed for the chemical testing of Pitts' blood at NMS Laboratories in Willow Grove, PA. Initial results from blood testing at Abington Hospital showed cannabinoids and alcohol at an amount of mg/dl 145H present in Pitts' blood. Later, police received the NMS toxicology report that shows alcohol present in Pitts' blood at 135 mg/dL, a .135 BAC (Blood Alcohol Level). Police also requested an impairment statement from NMS Labs which was done by toxicologist, Michael Lamb. Lamb's report stated that virtually all individuals with that concentration of alcohol in their system would exhibit impairment.

A traffic study was later conducted by the Cheltenham Police that showed the 85th percentile of traffic traveled at 45mph. The "85th Percentile" is widely regarded as the safe travel speed for any particular stretch of road.

An interview was later conducted by Ofc Justin Sneeringer and Det Michael Henricks from Montgomery County Detectives with Gilberta Caesar, the registered owner of the Nissan Rogue. In the course of the interview, she told police that Shaikan was at a family party the night of and prior to the crash.

Sgt Jeff Murphy then executed a search warrant for a mechanical inspection to be conducted on the Nissan Rogue. The inspection was conducted by Dennis DeWane Sr. at DeWane's Garage in Collegeville, PA. The opinion from DeWane Sr. was that there were no mechanical problems, failures or conditions that could have contributed to this crash. DeWane is a certified auto mechanic and recognized



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AFFIDAVIT CONTINUATION PAGE

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AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

expert in post crash vehicle inspections in Montgomery County, PA.

Ofc Justin Sneeringer then executed a search warrant for the physical instrument cluster panel from the Nissan Rogue to be examined. The examination was conducted by Det. Chiarlanza of the Springfield Township Police Department, a member of the Eastern Montgomery Regional Crash Team and a Collision Reconstructionist. Based on the examination done by Chiarlanza, it was determined that the Nissan Rogue was traveling between 65mph and 74mph.

Later, a physical momentum analysis was conducted by Det. Chiarlanza. The analysis conducted showed that the striking vehicle, Nissan Rogue, had an impact speed of 69.32mph. Our investigation also determined that at the time of the crash the victim, Holloman, was attempting to enter Old York Road and proceed southbound, requiring her to cross over the northbound lanes from the private driveway it was exiting. The line of sight is sufficient to see the nearest cross street, Ashbourne Rd, which is approximately 425 feet south from the point of impact. A vehicle traveling in the 85th percentile, 45mph, would take approximately 6-7 seconds for that vehicle to travel from Ashbourne Rd to the point of impact, more than sufficient time for Holloman to enter and cross the roadway. Conversely, the same distance / time factors apply for Pitts' vehicle. If the Nissan Rogue was traveling at 45mph it would only require 208 feet to perceive and recognize Holloman's vehicle, giving him sufficient line of sight time and distance to avoid striking it. However, all evidence indicates that Pitts was traveling at approximately 69mph while under the influence of alcohol and a controlled substance. The lack of signs of braking or evasive maneuvers indicate that Pitts did not perceive the crash or react in any manner.

Based on our investigation conducted and information received, we believe that Pitts was traveling at unsafe speeds and under the influence of alcohol and other narcotics. A driver's history was run on Pitts through PennDot. It was also discovered that Pitts has never had a valid drivers license. We believe Pitts' actions led to the crash and death of Laishah Holloman. We respectfully request a warrant for the arrest of Shaikan Pitts for the above listed charges.

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

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

[Signature]
(Signature of Affiant)

Sworn to me and subscribed before me this 22 day of March, 24.

22 MAR 24 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2030

