

COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF MONTGOMERY

POLICE CRIMINAL COMPLAINT

COMMONWEALTH OF PENNSYLVANIA

VS.

Magisterial District Number: 38-1-05

MDJ: Hon. JUANITA PRICE
117 YORK RD
SUITE C
Address: JENKINTOWN, PA 19046
Telephone: (215)885-4120

DEFENDANT:

(NAME and ADDRESS):

RAMON

GARCIA

First Name

Middle Name

Last Name

Gen

6104 ELMHURST TERRACE
PHILADELPHIA PA

19111

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 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	Date Filed 04/11/24	OTN/LiveScan Number /	Complaint 14764	Incident Number 24-010006	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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GENDER	DOB 06/27/1990	POB	Add'l DOB	Co-Defendant(s)
<input checked="" type="checkbox"/> Male				<input type="checkbox"/>
<input type="checkbox"/> Female	AKA	First Name	Middle Name	Last Name
				Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ UnknownETHNICITY ☒ Hispanic ☐ Non-Hispanic ☐ UnknownHAIR 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.) 200
FBI Number		MNU Number	
Defendant Fingerprinted:	<input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT In. 5 7
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).

ADA LAUREN MARVEL

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, JEFFREY ANDERSON

40579

4229

(Name of the Affiant)

PSP/MPOETC -Assigned Affiant ID Number and Badge #

of Abington Township Police Dept

PA0460100

(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 101 Abington Township

(Subdivision Code)

(Place-Political Subdivision)

CARBON HEALTH: MULTIPLE LOCATIONS IN MONTGOMERY COUNTY PENNSYLVANIA

in MONTGOMERY County [46] on or about Between 11/20/2023 and 03/09/2024
(County Code) (Offense Date)

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POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number	Complaint 14764	Incident Number 24-010006
Defendant Name	First: RAMON	Middle:	Last: GARCIA	

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 ____ through ____ .

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.)

JEFFREY ANDERSON

April 11, 2024
(Date)


(Signature of Affiant)

AND NOW, on this date _____ 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.

38-1-05

(Magisterial District Court Number)

(Issuing Authority)

SEAL

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POLICE CRIMINAL COMPLAINT

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Defendant Name	First: RAMON	Middle:	Last: GARCIA	

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 _____					
<input checked="" type="checkbox"/>	1	3125	(a)(1)	of the	PA Crimes Code	2	F2	11A	
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): PACC 3125(a)(1) Aggravated Indecent Assault									
Acts of the accused associated with this Offense: PACC 3125(a)(1) Aggravated Indecent Assault									

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"/>	2	4913	(a)(1)	of the	PA Crimes Code	1	M1		
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): IMPERSONATING NOTARY PUBLIC, HOLDER OF PROFESSIONAL LIC									
Acts of the accused associated with this Offense: PACC 4913(a)(1) Impersonating a notary public or holder of a professional/occupational license									

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"/>	3	4913	(a)(2)	of the	PA Crimes Code	2	M1		
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): IMPERSONATING NOTARY PUBLIC, HOLDER OF PROFESSIONAL LIC									
Acts of the accused associated with this Offense: PACC 4913(a)(2) Impersonating a notary public or holder of a professional/occupational license									

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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"/> Lead?	4	7507.1	(a)(1)	of the	PA Crimes Code	7	M2	
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): INVASION OF PRIVACY								
Acts of the accused associated with this Offense: PACC 7507.1(a)(1) INVASION OF PRIVACY								

Inchoate Offense	<input checked="" 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"/> Lead?	5	7507.1	(a)(1)	of the	PA Crimes Code	1	M2	
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): INVASION OF PRIVACY								
Acts of the accused associated with this Offense: PACC 7507.1(a)(1) INVASION OF PRIVACY								

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"/> Lead?	6	3126	(a)(1)	of the	PA Crimes Code	6	M2	
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): INDEC ASSAULT W/O CONSENT								
Acts of the accused associated with this Offense: PACC 3126(a)1 Indecent Assault								

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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 _____				
<input type="checkbox"/> Lead?	7	5703	(1)	of the	PA Crimes Code	1	F3	
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): WIRE, ELECTRONIC OR ORAL COMMUNICATIONS								
Acts of the accused associated with this Offense: PACC 5703(1) Interception, disclosure or use of wire, electronic or oral communications								

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"/> Lead?	8	907	(a)	of the	PA Crimes Code	3	M1	
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): POSS/INSTRU/CRIME W/INT								
Acts of the accused associated with this Offense: PACC 907(a) Possessing Instrument of Crime								

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"/> Lead?	9	2709	(a)(4)	of the	PA Crimes Code	1	M3	
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): HARASSMENT/LEWD, LASCIVIOUS ACTS								
Acts of the accused associated with this Offense: PACC 2709(a)(4) Harassment								

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AFFIDAVIT OF PROBABLE CAUSE

On March 11, 2024 Ramon Garcia was arrested for crimes committed against Victim #1 and Victim #2. These crimes took place while Garcia was working at Carbon Health in Montgomery County. A press release was put out following Garcia's arrest.

On March 12, 2024 Victim #3 contacted Abington Police Department. Victim #3 reported she had been to Carbon Health Urgent Care on March 9, 2024 for an appointment. Carbon Health Urgent Care is located at 1585 The Fairway, in the Jenkintown section of Abington Township in Montgomery County Pennsylvania. While there she was met by Ramon Garcia at the front desk. Garcia took her back to an exam room and told her he was a nurse. Garcia asked Victim #3 out on a date, and she replied that she was married. Garcia persisted, asking if she had ever wanted others and asked "is he a muncher," while sticking his tongue out. Garcia asked Victim #3 five more times if she would go out on a date with him.

On March 12, 2024 Victim #4 contacted Abington Police Department. Victim #4 reported she had been to Carbon Health Urgent Care in Abington on March 2, 2024 for an employment drug screening. While there she was met by Ramon Garcia at the front desk. Victim #4 said Garcia took her back and said her drug screening was the highest level of security and he would need to go in and witness the urine test. Victim #4 told Garcia she has never had someone say they had to go in with her. Garcia then told her that his boss was not there, so he will make an exception and not to tell anyone. Afterwards, Garcia told her that he recently had a female patient that he had to monitor that was wearing a dress. He said the woman didn't care that he was in the room and lifted up her dress right in front of him.

On March 12, 2024 Victim #5 contacted Abington Police Department. Victim #5 reported she had been to Carbon Health Urgent Care in Abington on January 30, 2024 for an appointment for pain in her breast. While there she was met by Ramon Garcia at the front desk. Garcia brought Victim #5 to an exam room and told her he had to do a pre-check before the doctor came in. Garcia had Victim #5 change into a gown, and stayed in the room while she undressed. Garcia took a picture of her breasts. Ramon then manually examined her breasts, making skin to skin contact. After the doctor came in for the examination, Garcia checked her out and told her she was beautiful. Garcia asked if she would be a model for his teeth whitening business. Garcia asked if she was in a relationship and sent her an email afterwards.

On March 11, 2024 a forensic download of Garcia's cellular phone was completed. On March 13, 2024 the contents of this download were reviewed. A picture was taken on the phone on March 3, 2024 at 1429 hours. The picture was of a female patient (Victim #6) wearing a medical gown inside of an exam room. The picture was taken from behind the victim, and did not appear she was aware the picture was being taken. On November 30, 2023 at 1217 hours Garcia recorded himself performing a blood draw on a female patient (Victim #7). The camera was setup behind where the patient was seated and a brief conversation was recorded. On February 26, 2024, at 1310 hours, Garcia placed his camera under a sink inside of a bathroom. He recorded a person (Victim #8) using the bathroom and picked the phone back up afterwards. Abington Police went to Carbon Health and confirmed the bathroom inside of this facility matched the one in the video.

On March 13, 2024 Victim #9 contacted Abington Police and was later interviewed. Victim #9 stated she had been to Carbon Health Urgent Care in Abington on March 7, 2024 for a sore throat. While there she was met by Ramon Garcia at the front desk. Victim #9 was informed they did not take her insurance and they agreed to do additional testing, which would be covered under the same price. One of the

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AFFIDAVIT CONTINUATION PAGE

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AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

additional tests was an STI test, and Garcia offered to swab Victim #9's vagina for her. Garcia performed a blood draw. Garcia extended her arm and place her hand onto his lap, touching his penis. Victim #9 moved her hand, but Garcia told her to hold still during the blood draw and placed her hand back onto his penis, which she described as being hard. Prior to leaving Garcia provided her with his phone number on the back of the business card.

On March 15, 2024 Victim #10 came into Abington Police Department. Victim #10 stated she went to Carbon Health Urgent Care on November 20, 2024 for a leg injury. This Carbon Health Urgent Care is located at 2019 Welsh Road in Dresher Pennsylvania, Montgomery County. While there she was met by Ramon Garcia at the front desk. He told her they needed to do an x-ray and that she needed to undress from the waist down. Garcia gave her a gown to put on and offered to help her take her pants off. Victim #10 removed her pants and underwear as Garcia instructed her to. While Victim #10 was on the table, Garcia said he needed to wash her leg before the x-ray. Garcia placed a bucket under her leg and proceeded to pour water down her leg. Victim #10 explained how she had no open wound or external injury and did not know why he needs to wash her leg. After Garcia said he needed to see the area of the injury, which included her leg and buttocks. Garcia touched her leg, and then began to touch her buttocks, moving her gown out of the way. Victim #10 stated there was nothing covering her buttocks as Garcia would touching it. Garcia had also provided Victim #10 his phone number.

On March 15, 2024 I spoke to an employee at Carbon Health in Abington. The employee stated on February 29, 2024 they saw Ramon coming out of the bathroom with a female patient (Victim #11) who was there for a drug screening. The employee stated there was a female employee present who could have observed the patient, but was not asked. The employee stated male staff are not allowed to observe or go into the bathroom with female patients.

On March 18, 2024 Victim #12 came into Abington Police Department and was interviewed. Victim #12 stated she went to Carbon Health in Abington on March 2, 2024 for an appointment. Victim #12 stated Ramon Garcia had her put on a gown and conducted a pelvic examination on her. Garcia used his gloved fingers to physically examine her vagina, separating and manipulating her vagina lips.

On March 21, 2024 Victim #13 came into Abington Police Department and was interviewed. Victim #13 stated she had an appointment at Carbon Health Urgent Care in Abington on February 21, 2024 for a mark on her leg. When she arrived, Ramon Garcia was at the front desk and said he was her nurse. Garcia took Victim #13 back to an exam room and told her to take her pants off, but did not offer her a gown to put on. Victim #13 described how Garcia ran his hands up her leg, squeezing and pressing, stating he was checking her veins. Garcia began to touch her pelvic area, touching directly next to her vagina.

On March 27, 2024 Victim #14 contacted Abington Police Department. Victim #14 stated she went to Carbon Health Urgent Care in Dresher in the last week of November 2023 for an appointment. During the appointment Ramon Garcia checked her in and introduced himself as a nurse. Victim #14 observed Garcia's nametag said MA on it and brought up that he was not a nurse. Garcia told Victim #14 that he was a registered nurse. Garcia told Victim #14 she was beautiful and asked if she was in a relationship, before providing her with his phone number.

Ramon Garcia was employed with Carbon Health Urgent Care at the time of these reports. Garcia



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AFFIDAVIT CONTINUATION PAGE

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AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

was not employed by the company as a nurse and told police that he was not a licensed nurse.

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

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


(Signature of Affiant)

Sworn to me and subscribed before me this 11 day of April, 2024.

_____, Date _____, Magisterial District Judge

My commission expires first Monday of January,

SEAL