

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ALLEGHENY

MDJ: PITTSBURGH MUNICIPAL COURT
Magisterial District Number: 05-0-03
Address: 660 FIRST AVENUE
PITTSBURGH, PA 15219

Phone: 412.350.6715



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

JOHN

EZRA

SCHULMAN

First Name

Middle Name

Last Name

Gen.

6526 DALZELL PLACE
PITTSBURGH PA 15217

NCIC Extradition Code Type

Felony - Full Extradition

Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-6011-18	Date Filed 7-20-18	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17	Request Lab Services? <input type="checkbox"/> Yes
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GENDER MALE	DOB 11/12/1963	POB	Add'l DOB	Co-Defendant(s) <input checked="" type="checkbox"/>
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RACE WHITE	First Name	Middle Name	Last Name	Gen.
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ETHNICITY	AKA
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HAIR COLOR	EYE COLOR BRO (BROWN)
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DNA	DNA Location	WEIGHT (lbs.)
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FBI Number	MNU Number	H. HEIGHT (in.)
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Defendant Fingerprinted	5	07
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Fingerprint Classification

DEFENDANT VEHICLE INFORMATION

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

(Name of the Affiant)

26260

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

of DISTRICT ATTORNEYS DETECTIVES

PA002013A

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. X 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 301 PITTSBURGH CITY
(Subdivision Code) (Place-Political Subdivision)

In Allegheny County

02
(County Code)

on or about 04/17/1991



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a **brief** summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. In addition, social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account must be established, list only the last four digits. 204 Pa.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						
X	1	3921	A	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PenndOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3921A THEFT BY UNLAWFUL TAKING F1 1 COUNT The actor unlawfully took, or exercised unlawful control over movable property, namely rare books and/or maps and/or plates, with a total value greater than or equal to \$500,000 from Carnegie Library of Pittsburgh, with the intent to deprive the owner thereof, in violation of 18 Pa. C.S. §3921(a).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
	2	3925	A	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PenndOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3925A RECEIVING STOLEN PROPERTY F1 1 COUNT The actor intentionally received, retained, or disposed of movable property, namely rare books and/or maps and/or plates with a total value of \$500,000 or more and belonging to Carnegie Library of Pittsburgh knowing that it had been stolen, or believing that it had probably been stolen and without intent to restore it to the owner thereof, in violation of 18 Pa.C.S. §3925(a) and 3903(a.2).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	3	5111	A1	of the	18	1	F1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 5111A1 DEALING IN THE PROCEEDS OF ILLEGAL ACTIVITY F1 1 COUNT The actor, knowing that the property involved in a financial transaction represented the proceeds of an unlawful activity, conducted a financial transaction which involved the proceeds of the unlawful activity, namely selling stolen rare books and/or maps and/or plates from the Carnegie Library of Pittsburgh with intent to promote the carrying on of the unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise nature, location, source, ownership or control of the proceeds of unlawful activity and/or to avoid a transaction reporting requirement under State or Federal law, in violation of 18 Pa. C.S. §5111(a)(1) or (2) or (3).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	4	3925	A	of the	18	2	F1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY F1 2 COUNTS The actor, with the intent of promoting or facilitating the crime of 18:3921:A conspired and agreed with Gregory Priore that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1). The actor, with the intent of promoting or facilitating the crime of 18:3925:A conspired and agreed with Gregory Priore that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	5	3929.3	A	of the	18	1	F2	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3929.3A RETAIL THEFT F2 1 COUNT The actor organized, coordinated, controlled, supervised, financed or managed any of the activities of an organized retail theft enterprise, namely receiving and selling stolen rare books and/or maps and/or plates from the Carnegie Library of Pittsburgh, in violation of 18 Pa. C.S. §3929.3.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	6	3929.3	A	of the	18	1	F2	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY F2 1 COUNT The actor, with the intent of promoting or facilitating the crime of 18:3929.3:A conspired and agreed with Gregory Priore that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	7	3922	A1	of the	18	6	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3922A1 THEFT BY DECEPTION F3 6 COUNTS									
The actor intentionally obtained or withheld property, namely, United States Currency with a total value greater than \$2,000 belonging to 19th Century Rare Books by deception, in violation of, 18 Pa. C.S. §3922.									
The actor intentionally obtained or withheld property, namely, United States Currency with a total value greater than \$2,000 belonging to Bartleby's Books and/or Peter Harrington by deception, in violation of, 18 Pa. C.S. §3922.									
The actor intentionally obtained or withheld property, namely, United States Currency with a total value greater than \$2,000 belonging to Bartleby's Books by deception, in violation of, 18 Pa. C.S. §3922.									
The actor intentionally obtained or withheld property, namely, United States Currency with a total value greater than \$2,000 belonging to Maggs Bros. Ltd. Rare Books and Manuscripts by deception, in violation of, 18 Pa. C.S. §3922.									
The actor intentionally obtained or withheld property, namely, United States Currency with a total value greater than \$2,000 belonging to Ittai Gradel by deception, in violation of, 18 Pa. C.S. §3922.									
The actor intentionally obtained or withheld property, namely, United States Currency with a total value greater than \$2,000 belonging to Maggs Bros. Ltd. Rare Books and Manuscripts by deception, in violation of, 18 Pa. C.S. §3922.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	8	4101	A2	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 4101A2 FORGERY F3 1 COUNT									
The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely Notice of deaccession letter purportedly authorized by the Carnegie Library of Pittsburgh, so that it purported to be the act of another, namely Carnegie Library of Pittsburgh, who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S. §4101(a)(2).									



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Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	9	4101	A3	of the	18	1	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 4101A3 FORGERY F3 1 COUNT The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, namely Carnegie Library of Pittsburgh and/or Bartleby's Books, uttered a writing, namely Notice of deaccession letter purportedly authored by Greg Priore on behalf of the Carnegie Library of Pittsburgh, which said actor knew to be forged in a manner specified in sections 4101(a)(1) or (2), in violation of 18 Pa.C.S. §4101(a)(3).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	10	4107	A1	of the	18	1	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 4107A1 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES F3 1 COUNT The actor, in the course of business, used or possessed for use a false weight or measure, or any other device for falsely determining or recording any quality or quantity, namely, Withdrawn stamp, in violation of 18 Pa.C.S. §4107(a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	11	4107	A4	of the	18	1	F3		
	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 4107A4 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES F3 1 COUNT The actor, in the course of business, sold, offered or exposed for sale adulterated or mislabeled commodities, namely rare books stamped withdrawn without having been withdrawn from the proper authority, in violation of 18 Pa.C.S. §4107(a)(4).									



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	12	4107	A6	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 4107A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES F3 1 COUNT The actor, in the course of business, made a false or misleading written statement, namely Notice of deaccession letter purportedly authored by Greg Priore on behalf of the Carnegie Library of Pittsburgh for the purpose of obtaining property or credit, namely United States Currency, in violation of 18 Pa.C.S. §4107(a) (6).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	13	4101	A2	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A2 CRIMINAL CONSPIRACY F3 1 COUNT The actor with the intent of promoting or facilitating the crime of 18:4101:A2 conspired and agreed to aid Gregory Priore in the planning or commission of the aforesaid crime or of an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a) (2).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	14	3922	A1	of the	18	1	M1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3922A1 THEFT BY DECEPTION M1 1 COUNT The actor intentionally obtained or withheld property, namely United States Currency with a total value greater than or equal to \$200 and less than or equal to \$2,000 belonging to Emory University and/or Pitts Theology Library by deception, in violation of 18 Pa. C.S. §3922.									



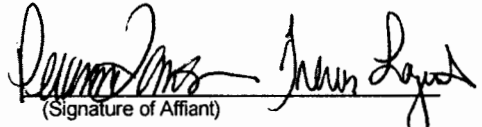
POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

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 is comprised 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.)

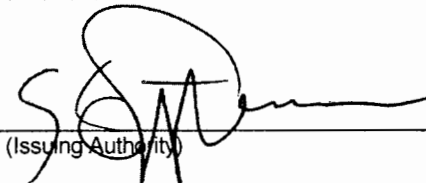

(Signature of Affiant)

(Date)

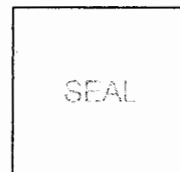
AND NOW, on this date July 20, 2018 I certify that the complaint has been properly completed and verified.

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

05-2-22
(Magisterial District Court Number)


(Issuing Authority)

CRAIG C. STEPHENS,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-2-22
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2022





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

AFFIDAVIT of PROBABLE CAUSE

1. WHEN:

- a) Date when Affiant received information:
06/09/2017
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:
04/07/2017

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
Co-defendant admissions, admissions made by Defendant
- b) How the source of information knows this particular person committed the crime:
- c) How both Affiant and/or source of information knows that a particular crime has been committed:

3. WHAT CRIMES:

18 3921 A THEFT BY UNLAWFUL TAKING
18 3925 A RECEIVING STOLEN PROPERTY
18 3929.3 A RETAIL THEFT
18 903 A1 CRIMINAL CONSPIRACY
18 903 A1 CRIMINAL CONSPIRACY
18 5111 A1 DEALING IN THE PROCEEDS OF ILLEGAL ACTIVITY
18 903 A2 CRIMINAL CONSPIRACY
18 903 A1 CRIMINAL CONSPIRACY
18 4101 A2 FORGERY
18 4101 A3 FORGERY
18 3922 A1 THEFT BY DECEPTION
18 4107 A1 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
18 3922 A1 THEFT BY DECEPTION
18 3922 A1 THEFT BY DECEPTION
18 3922 A1 THEFT BY DECEPTION
18 4107 A6 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
18 3922 A1 THEFT BY DECEPTION
18 3922 A1 THEFT BY DECEPTION
18 4107 A4 DECEPTIVE OR FRAUDULENT BUSINESS PRACTICES
18 3922 A1 THEFT BY DECEPTION

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 813813-0	Complaint/Incident Number F-295-17
Defendant Name	First: JOHN	Middle: EZRA	Last: SCHULMAN

4. WHERE CRIME(S) COMMITTED:

PITTSBURGH, PA

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.

Source has given information in the past which has led to arrest and/or conviction

Defendant's reputation for criminal activity

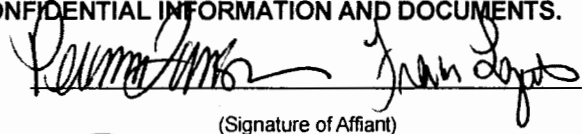
This source made declaration against his/her penal interest to the above offense

X Affiant and/or other Police Officers corroborated details of the information

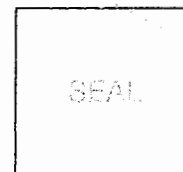
See attached Affidavit

I, FRANCES LAQUATRA, 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 20th day of July, 2018
7/20/2018 Date S. S. [Signature], Magisterial District Judge
 My commission expires first Monday of January,

2022

CRAIG C. STEPHENS,
 MAGISTERIAL DISTRICT JUDGE
 MAGISTERIAL DISTRICT 05-2-22
 MY COMMISSION EXPIRES ON THE
 FIRST MONDAY IN JANUARY, 2022

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: ALLEGHENY

MDJ: PITTSBURGH MUNICIPAL COURT

Magisterial District Number: 05-0-03

Address: 660 FIRST AVENUE
PITTSBURGH, PA 15219

Phone: 412.350.6715



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT:

GREGORY

(NAME and ADDRESS):

MICHAEL

PRIORE

First Name

Middle Name

Last Name

Gen.

4716 ELLSWORTH AVENUE APT#823 PITTSBURGH, PA 15213

NCIC Extradition Code/Type

Felony - Full Extradition

Distance: _____

DEFENDANT IDENTIFICATION INFORMATION

Docket Number

Date Filed

OTN/LiveScan Number

Complaint/Incident Number

Request Lab Services?

6012-18

7/20/18

G 813814-1

F-295-17

☐ Yes

GENDER MALE

DOB 08/25/1956

POB

Add'l DOB

Co-Defendant(s) ☒

RACE WHITE

First Name

Middle Name

Last Name

Gen.

ETHNICITY

AKA

HAIR COLOR

EYE COLOR GRN (GREEN)

DNA

DNA Location

WEIGHT (lbs)

FBI Number

MNU Number

FL HEIGHT (ft)

Defendant Fingerprinted

5

11

Fingerprint Classification

DEFENDANT VEHICLE INFORMATION

Plate #

State

Hazmat

Registration
Sticker (MM/YY)

Comm'l
Veh. Ind.

School
Veh.

Oth. NCIC Veh. Code

Reg.
Same
as Def.

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).

name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, FRANCES LAQUATRA

26260

(Name of the Affiant)

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

of DISTRICT ATTORNEYS DETECTIVES

PA002013A

(Identify Department or Agency Represented and Political Subdivision)

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. X 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

301

PITTSBURGH CITY

(Subdivision Code)

(Place-Political Subdivision)

In Allegheny County

02

(County Code)

on or about 04/17/1991



POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed:	OTN/LiveScan Number G 813814-1	Complaint/Incident Number F-295-17
Defendant Name	First: GREGORY	Middle: MICHAEL	Last: PRIORE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. In addition, social security numbers and financial information (e.g. PINS) should not be listed. If the identity of an account must be established, list only the last four digits. 204 Pa.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						
X	1	3921	A	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3921A THEFT BY UNLAWFUL TAKING F1 1 COUNT The actor unlawfully took, or exercised unlawful control over movable property, namely rare books and/or maps and/or plates, with a total value greater than or equal to \$500,000 from Carnegie Library of Pittsburgh, with the intent to deprive the owner thereof, in violation of 18 Pa. C.S. §3921(a).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
	2	3925	A	of the	18	1	F1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number				<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		
Statute Description/Acts of the accused associated with this Offense:									
18 3925A RECEIVING STOLEN PROPERTY F1 1 COUNT The actor intentionally received, retained, or disposed of movable property, namely rare books and/or maps and/or plates with a total value of \$500,000 or more and belonging to Carnegie Library of Pittsburgh knowing that it had been stolen, or believing that it had probably been stolen and without intent to restore it to the owner thereof, in violation of 18 Pa.C.S. §3925(a) and 3903(a.2).									



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	3	3921	A	of the	18	2	F1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY F1 2 COUNTS									
The actor, with the intent of promoting or facilitating the crime of 18:3925:A conspired and agreed with John Schulman that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									
The actor, with the intent of promoting or facilitating the crime of 18:3921:A conspired and agreed with John Schulman that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	4	3304	A5	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (If applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3304A5 CRIMINAL MISCHIEF F3 1 COUNT									
The actor intentionally damaged real or personal property of another, namely Carnegie Library of Pittsburgh causing pecuniary loss in excess of \$5,000, or substantial interruption or impairment of public communication, transportation, supply of water, gas or power, or other public service, in violation of 18 Pa. C.S. §3304 (a)(5) and (b).									



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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						
Lead?	5	3929.3	A	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3929.3A RETAIL THEFT F3 1 COUNT The actor organized, coordinated, controlled, supervised, financed or managed any of the activities of an organized retail theft enterprise, namely Removing rare books and/or maps and/or plates from the Carnegie Library, in violation of 18 Pa. C.S. §3929.3.									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	6	4101	A2	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 4101A2 FORGERY F3 1 COUNT The actor, with the intent to defraud or injure or with knowledge that said actor was facilitating a fraud or injury upon another, made, completed, executed, authenticated, issued or transferred a writing, namely Notice of deaccession purportedly authorized by the Carnegie Library of Pittsburgh, so that it purported to be the act of another, namely Carnegie Library of Pittsburgh, who did not authorize that act or to have been executed at a time or place or in a numbered sequence other than was in fact the case, or to be a copy of an original when no such original existed, in violation of 18 Pa.C.S. §4101(a)(2).									



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	7	3929.3	A	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A1 CRIMINAL CONSPIRACY F3 1 COUNT The actor, with the intent of promoting or facilitating the crime of 18:3929.3:A conspired and agreed with John Schulman that they or one or more of them would engage in conduct constituting such crime or an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a)(1).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903						
Lead?	8	4101	A2	of the	18	1	F3	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 903A2 CRIMINAL CONSPIRACY F3 1 COUNT The actor with the intent of promoting or facilitating the crime of 18:4101:A2 conspired and agreed to aid John Schulman in the planning or commission of the aforesaid crime or of an attempt or solicitation to commit such crime, and in furtherance thereof did commit an overt act in violation of 18 Pa. C.S. §903 (a) (2).									

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903						
Lead?	9	3929.1	A	of the	18	1	M1	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade			
Accident Number					<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone			
Statute Description/Acts of the accused associated with this Offense:									
18 3929.1A LIBRARY THEFT M1 1 COUNT The actor willfully concealed on his person or among his belongings library or museum material, namely, rare books and/or maps and/or plates while still on the premises of a library, namely, Carnegie Library of Pittsburgh or willfully and without authority removed said material from said library with the intention of converting said material to his own use in violation of 18 Pa.C.S. §3929.1(a).									



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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 is comprised 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.)

(Date)

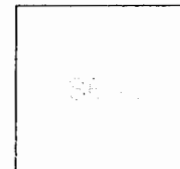
(Signature of Affiant)

AND NOW, on this date July 20, 2018 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.

05-2-22
(Magisterial District Court Number)

(Issuing Authority)



CRAIG C. STEPHENS,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-2-22
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2022

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed:	OTN/LiveScan Number G 813814-1	Complaint/Incident Number F-295-17
Defendant Name	First: GREGORY	Middle: MICHAEL	Last: PRIORE

AFFIDAVIT of PROBABLE CAUSE**1. WHEN:**

- a) Date when Affiant received information:
06/09/2017
- b) Date when the source of information (Police Officers, Informant, Victim, Co-Defendant, Defendant, etc.) received information:
04/07/2017

2. HOW:

- a) How Affiant knows this particular person committed crime: (personal observation, defendant's admissions, etc.):
Defendant's admission, co-defendant admissions
- b) How the source of information knows this particular person committed the crime:
- c) How both Affiant and/or source of information knows that a particular crime has been committed:

3. WHAT CRIMES:

18 3929.1 A LIBRARY THEFT
18 3921 A THEFT BY UNLAWFUL TAKING
18 903 A1 CRIMINAL CONSPIRACY
18 903 A1 CRIMINAL CONSPIRACY
18 3304 A5 CRIMINAL MISCHIEF
18 3925 A RECEIVING STOLEN PROPERTY
18 3929.3 A RETAIL THEFT
18 903 A2 CRIMINAL CONSPIRACY
18 903 A1 CRIMINAL CONSPIRACY
18 4101 A2 FORGERY

4. WHERE CRIME(S) COMMITTED:

PITTSBURGH, PA

5. WHY AFFIANT BELIEVES THE SOURCE OF INFORMATION:

- X Source is presumed reliable, i.e. other Police Officer, Eyewitness, Victim of Crime, etc.
Source has given information in the past which has led to arrest and/or conviction
Defendant's reputation for criminal activity
This source made declaration against his/her penal interest to the above offense
- X Affiant and/or other Police Officers corroborated details of the information



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: GREGORY	Middle: MICHAEL	Last: PRIORE

See attached affidavit:

I, FRANCES LAQUATRA, 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.

Frances Laquatra Priore
(Signature of Affiant)

Sworn to me and subscribed before me this 20th day of July 2018
7/20/2018 Date [Signature], Magisterial District Judge

My commission expires first Monday of January,

2022



CRAIG C. STEPHENS,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-2-22
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2022

Your Affiants, Frances Laquatra and Perann Tansmore, are Detectives with the Allegheny County District Attorney's office and have been employed in this capacity for twenty (20) years and nine (9) years, respectively. Prior to her employment at the District Attorney's office, Detective Tansmore was a Special Agent with the Pennsylvania Attorney General's office for ten years. As such, your Affiants have extensive experience in the investigation and prosecution of corruption and white collar crimes.

The information contained in this affidavit is based on: evidence and/or information obtained from participants and eyewitnesses as described herein; evidence and/or information personally obtained or observed during the course of this investigation; evidence or information obtained or observed by other detectives directly involved in this investigation and subsequently reviewed by your affiant and incorporated herein.

INITIATION OF INVESTIGATION

On June 22, 2017, Allegheny County District Attorney's Office Detectives Frances Laquatra and Perann Tansmore initiated a criminal investigation based upon a complaint received by the administration of the Carnegie Library of Pittsburgh (hereafter referred to as "CLP"). The complaint alleged that numerous rare books, atlases and/or folios originally secured with the William R. Oliver Special Collections Room (hereinafter referred to as "the Oliver Room"), located on the 3rd floor of the Carnegie Library, 4400 Forbes Avenue, Pittsburgh PA 15213, were discovered to be either missing or vandalized. This complaint was based upon an appraisal of the Oliver Room contents conducted on behalf of CLP in April 2017 by Pall Mall Art Advisors of Philadelphia PA. During their on-site appraisal, Pall Mall Art Advisors (hereinafter referred to as "PMAA") identified multiple items as being missing or damaged. Damage consisted of images, maps and/or "plates" (illustrated pages) having been torn or cut from their respective book, atlas or folio, oftentimes rendering the remaining item worthless.

BACKGROUND INFORMATION

The Oliver Room is a separate room located on the 3rd floor of the Library, accessible through a single door. It was first established as a Special Collections room

around 1986, and originally called the Wadsworth Room. In the mid-1990's, the room was renamed the William R. Oliver Special Collections Room in honor of a long-time trustee. The room serves to house the CLP's collection of unique and valuable items, the archives of the library, and manuscript collections. The total collection size is approximately 30,000 items. In 1991, an audit/appraisal of the collections contained within the room at that time was conducted on behalf of the CLP, documenting items, condition and estimated values. The approximate value of the items in the Oliver Room at that time was \$1,964,925.00 (not adjusted for inflation).

In 1992, Greg Priore ("Priore") was appointed as sole archivist and manager of the Oliver Room. Priore's responsibilities included preserving the history of the library, identifying items that should be placed in the Oliver Room, and maintaining the room's contents. Priore also granted access and supervised visitors to the room which was usually open (by appointment) weekdays between 10:00 AM and 5:00 PM. Visitors to the room were required to place their personal items in a storage locker prior to entering the room. Visitors or researchers requesting access to any of the room's contents would have to submit their request to Priore, who would then retrieve the item and bring it to the requestor at a large table in the front of the room. Once the requestor was finished, Priore would return the item to its original location. Priore's desk, positioned at the front of the Oliver Room, provided him with a vantage point that allowed him to supervise the entire room, including the area of the aforementioned table. The door to the Oliver Room was locked, with limited distribution of keys. Priore also requested notification of any entry, and his permission and presence was required if any staff member were to enter the room.

Priore held that position until being placed on leave in April 2017, ultimately being terminated on June 28, 2017.

Authorized deaccession (to officially remove an item from the listed holdings of a library, museum, or art gallery, typically in order to sell it to raise funds) and/or sale of rare books or manuscripts from CLP did occur on occasion. Guidelines and procedures for such a process were in place, and were developed to ensure that the removal of materials would be done in a formal, consistent, and ethical manner in the best interests of the library and the community. Those procedures would have authorized the

archivist (Priore) to recommend the material(s) to be deaccessioned from the Oliver Room based on specific criteria with the approval of the Library Director. The criteria to be evaluated included: historical importance, relevance to and consistency with the rest of the collection, the condition of the work, the preservation costs, physical integrity, authenticity, future user potential, and/or whether another public institution or museum would be a more appropriate repository for the material. Prior to a work being sold, CLP's deaccession policy stated that CLP must first establish that it has a full legal title to the material and that CLP has the authority to sell the material under the terms of any donations, benefactions or grants that may apply.

According to CLP President and Executive Director Mary Frances Cooper, Director of Finance and Administration Linda Barsevich and Library Services Administrator Jennifer Pickle-Styrant, no item from the Oliver Room was ever requested or authorized to have been deaccessioned.

On April 3, 2017, CLP administration initiated a new audit/appraisal of the Oliver Room and its contents, to be conducted by PMAA.

On April 7, 2017, PMAA appraisers met with CLP administration members Cooper, Barsevich and Pickle-Styrant. The PMAA appraisers advised that they were unable to locate certain items from the 1991 audit within the Oliver Room. In addition, appraisers found items from the 1991 audit from within which atlases, photographic works and other folios with plates were intentionally removed.

On April 11, 2017, the lock to the Oliver Room was changed, limiting access to only Cooper and Barsevich. Priore was restricted from physically accessing the Oliver Room at this time. The Oliver Room has remained closed to the public and general staff since this time.

Due to these issues, the appraisers spent several more weeks examining and cataloging items in the room. The appraisers compared the items in the 1991 audit to what was currently stored in the Oliver Room. Their initial review indicated that there were approximately 320 items missing and 16 "diminished" or vandalized by removal of a portion of the original item.

- Photograph "Attachment #1" depicts the front of the Oliver Room. In the background is the archivist's desk area.

- Photograph "Attachment #2" depicts an example of the rows of bookshelves.
- Photograph "Attachment #3" is another example of the rows of bookshelves, this one filled with carts loaded with additional items.

According to the initial PMAA audit report, the estimated retail replacement value (loss) of all appraised items found to be missing or diminished was \$8,101,850.00.

The appraised "retail replacement value", as defined by the Appraisers Association of America, is the highest amount in terms of US dollars that would be required to replace a property with another of similar age, quality, appearance, provenance and condition within a reasonable length of time in an appropriate and relevant market. When applicable, sales and/or import tax, commissions and/or premiums are included in this amount.

While conducting online searches in early April 2017, PMAA appraisers discovered an item determined through their audit to be missing from the CLP Oliver Room. This item, a book entitled "Genealogie deorum gentilium", was found to have been sold in 2012 through Bloomsbury Auctions. This book was also cataloged as having CLP identifying stamps contained within.

PMAA appraisers also discovered another missing item, a book entitled "L'Arte vetraria distinta in libri sette", listed for sale at that time through Blackwell's in Great Britain. In addition to also containing CLP identifying stamps, it also displayed a "withdrawn" stamp in red ink, and was confirmed to have been sold by Caliban Book Shop.

PMAA appraisers also located both historic and recent instances in which the following CLP items found to be missing were subsequently sold or advertised for sale by or through Caliban Book Shop, 410 South Craig Street, Pittsburgh, PA 15213:

1. "Quaestiones in Theoricis Planetarum Georgii Purbachii"
2. "Le Vite Delle Donne Illustri"
3. "The Political Register and Impartial Review of New Books"
4. (Spanish Nobility Patents, Hand Colored Miniatures, Spanish Manuscripts)
5. "The Merchants Mappe of Commerce"

6. "Notitia Utraque Cum Orientis Tum Occidentis...."
7. "Carta Executoria de Hidalguia a Pedimento de Anton Corvera Villalta Vezino de la Villa de Moron"
8. "Carta Executoria de Hidalguia en Possession General a Pedimento de Pedro Goncalvez Gil Vezino de la villa de Vejar"
9. "America... The Latest and Most Accurate Description of the New World" (plates)
10. "Opera de Sostume Italiani" (plates)
11. "Costume of China" (plates)
12. "Natural History of Uncommon Birds... in Four Parts" (plates)
13. "A new and elegant general atlas : comprising all the new discoveries, to the present time, containing sixty-five maps"
 - a. This atlas, cataloged by CLP in 2013, was discovered as having been purchased online from Caliban Book Shop in the fall of 2013. The purchaser, Robert Smith from Denver Colorado, contacted CLP after noticing CLP markings and suspected that the book had not been deaccessioned. Smith, after confirming through CLP that the book had been stolen, communicated with Caliban owner John Schulman to facilitate the book's return to CLP. Smith later advised CLP that he returned the book to John Schulman of Caliban Books at his home address, per Schulman's instructions. (A subsequent review by investigators of Smith's email correspondence to Schulman through his Gmail address of johneschulman@gmail.com confirmed this sequence of events. Investigators also located Caliban Book Shop check #33353 in the amount of \$600.00, dated November 23, 2013, which was used to refund Smith.) Priore was also involved in retrieving the book from Schulman, and returning the book to the Oliver Room.
 - b. During that same time period, Smith advised CLP to check their copy of Collet's Voyages (limited to 100 published copies) to verify it was still intact, after recalling some original Collet maps having been sold on Ebay a few years prior. According to CLP administration officials, Priore

confirmed to the administration that the CLP book was intact. That same book was later discovered through the PMAA audit as having been gutted of the Collet maps.

14. **De la France et des Etats-Unis**, a 1787 first edition signed by Thomas Jefferson, was recently discovered as being listed for sale on the internet through Bauman Rare Books, a bookseller with offices in New York and New Jersey.

GREGORY PRIORE

As part of their internal investigation, CLP administration officials conducted a cursory review of the CLP email account assigned to Priore, **prioreg@carnegielibrary.org**. Among these emails were several between 2015 and 2016 in which Priore communicated with tuition billing contacts at both the Ellis School and Duquesne University. In several of the Ellis School emails, Priore requested to have pending payment due dates extended. In one such email thread, dated October 28, 2015, Priore stated, "I am trying to juggle tuition payments for 4 kids."

In an email to Duquesne University dated December 7, 2015, Priore advised that he had made a payment of \$2,800 to his child's account, and requested that a previous account hold be lifted so that she could register for classes. In another email dated January 4, 2016, Priore advised that he had made a payment of \$3,665 to another child's account, and requested that a previous account hold be lifted so that child could register for classes.

In an email thread to empireassociates@comcast.net dated February 23, 2016, Priore discussed sending four checks to cover what appeared to be several months' worth of late payments for "823 Renewal". (Empire Associates is a property management company for the Cathedral Mansion Apartments, 4716 Ellsworth Avenue, Pittsburgh PA 15213. Priore's listed address is 4716 Ellsworth Avenue, Apt. 823, Pittsburgh PA 15213.) Priore asked that one check be held until March 11th, explaining that his wife had been unable to work until recently due to her December heart attack. (Priore's wife is a full-time employee of CLP with no record of any leave taken during that time period.)

A review of Priore's CLP emails by the administration also reflected a working relationship between Priore and Schulman. In one email dated August 16, 2016, Priore stated to the recipient: "John Schulman at Caliban is the only game in town. But that's not a bad thing. I have known John for many years."

Priore was interviewed by CLP administration on April 18, 2017. During this interview, Priore stated that he never left any customer in the Oliver Room unattended, although he did occasionally trust interns and cataloguers to be left in the room with patrons. Priore stated that prior to 2004, items to be cataloged were removed from the Oliver Room and taken to the basement. After 2004, cataloging was conducted within the Oliver Room. Priore also claimed that for 11-12 years, approximately 30 interns and volunteers may have been in the room by themselves. Priore also commented on maintenance workers having access to the room without security measures being taken. Priore did acknowledge that he was lazy in maintaining logs of visitors and the items to which they requested access. Priore was asked specifically about the PMAA appraisal process once they began to identify missing items. He said that once the appraisers began asking for specific missing items, he became flustered because they were asking so many questions and he could not answer.

JOHN SCHULMAN AND CALIBAN BOOK SHOP

John Schulman and his wife Emily Hetzel have co-owned Caliban since 1991. Caliban's website states that the shop buys, sells, and appraises "books, photographs, printed material and original art." The website also states that Caliban is a "proud member of the Antiquarian Booksellers Association of America (ABAA) and International League of Antiquarian Booksellers (ILAB), conforming to their high standards of business practice and ethical conduct." According to his biography on the website for the PBS television show "Antiques Roadshow", Schulman has also appeared as an expert appraiser for the program many times since 1997.

Caliban Book Shop is located at 410 South Craig Street, Pittsburgh, PA 15213. Caliban Book Shop also has a warehouse (hereinafter referred to as "the warehouse") located at 610 Ross Avenue, Wilkinsburg, PA 15221, which is associated with their online sales. Email accounts associated with and used by Schulman for Caliban include: info@calibanbooks.com, calibanbooks@gmail.com, and

johneschulman@gmail.com. All of these emails were used by Schulman when communicating with CLP staff regarding the purchase of books being offered for sale by CLP since at least 2016.

President and Executive Director Cooper, Director of Finance and Administration Barsevich and Library Services Administrator Pickle-Styran stated that in addition to the fact no item from the Oliver Room was ever deaccessioned, the items identified by PMAA as having been stolen/removed from the Oliver Room were never authorized for sale to John Schulman or Caliban. CLP *did* engage with Schulman/Caliban in the sale of some outdated or duplicate CLP items, but never any items from the Oliver Room.

Records obtained from CLP reflected total sales records of book/periodical sales from CLP to John Schulman/Caliban Book Shop from 2008 to present date as follows:

- 2008 - \$1,592.00
- 2009 - \$8,250.00
- 2010 - \$6,465.00
- 2011 - \$2,230.00
- 2012 – 2016 – no sales recorded
- 2017 - \$1,360.00

Caliban Book Shop's website <https://www.calibanbooks.com/> indicated that Caliban also offered books for sale through the user ID listed as "rarebookstore"eBay, Inc., the online sales site.

CURRENT INVESTIGATION

On July 25, 2017, detectives received a telephone call from Mary Frances Cooper in regards to this investigation. According to Cooper, John Schulman had contacted PMAA appraiser Christiana Scavuzzo regarding a book that he had sold to another book dealer. This book was one of the books listed as missing in the PMAA appraisal. Schulman allegedly told Scavuzzo that he purchased this book through CLP employee Sheila Jackson twenty years ago, when he also purchased many other books from the library at the West End location. Schulman also told Scavuzzo that Jackson had given him a "withdrawn" stamp from the library so that he could stamp the books.

On July 26, 2017, detectives interviewed Sheila Jackson, who had been employed by the Carnegie Library from 1973 through June 2016. Jackson began her

career as a clerk and worked her way up to Assistant Director of the Main Library, which was her position at the time of her retirement in June 2016. Jackson said that starting in 2001, the collections of books that had been stored in the West End were being "merged and weeded out." She explained that all of the books, journals and documents were looked at by a library specialist to see if they were an item that the library would want to keep. The purpose of this was to make sure that nothing of value was destroyed, sold, donated, etc. The books that the specialists identified and put aside to be sold, donated or destroyed then had to be reviewed by a department head. Once the item was approved to be sold, donated or destroyed it was stamped with a withdrawn stamp. Each department had their own stamp. When asked if she ever gave a withdrawn stamp to someone outside of the library, Jackson stated "absolutely not," and "that would defeat the purpose of having the stamp."

On July 27, 2017, detectives interviewed appraiser Christiana Scavuzzo, who, along with Kerry-Lee Jeffery, were the appraisers hired by the Carnegie Library to conduct the April 2017 appraisal of the Oliver Room. Scavuzzo was asked to explain the process that was used to appraise the Oliver Room. She said that they were provided with a copy of the 1991 appraisal to compare what was in the room at that time and what should be in the room at the present time, plus any other items added after 1991. On the second day of the appraisal, they began to find books which had been "cannibalized". Scavuzzo explained that the term "cannibalized" referred to an item such as a book from which portions were removed. In this case, "plates" (illustrated pages) were discovered as having been removed from several Oliver Room books. Greg Priore, the archivist at the time, was asked if he knew where the plates were. Priore told the appraisers that he didn't know where they were or if they existed.

As they continued their appraisal, Scavuzzo and Jeffery continued to find books that were damaged or could not be located within the room. Both questioned Priore about their findings and he was not helpful to them. The answers that Priore gave them were inconsistent and they found discrepancies in his answers. For example, Priore claimed that in 1993 he had notified someone that a book was missing one plate. When they asked who he told, he said that person died. When they looked at the book, there were actually three plates missing. As they looked through the entire room, Scavuzzo

and Jeffery discovered that damaged books tended to be found placed in boxes high on a shelf as if intentionally hidden.

- Photograph "Attachment #4" depicts a sample of the damage discovered during the appraisal. In this instance, it is the interior of the "Gerardus Mercator Atlas", within which multiple pages of illustrations had been removed.
- Photograph "Attachment #5" depicts another sample of the damage. In this instance, the entire contents of "Caitlin's North American Portfolio" had been gutted.

Scavuzzo researched the Oliver Room's missing books and found several of the books online listed either for sale or sold. The books found online were associated with the Caliban Bookstore. One of the books listed as missing from the Oliver Room, "De La France et des etats-Unis" (mentioned above), was found online for sale by Bauman's, a bookstore with locations in Philadelphia, New York and Las Vegas. The book was listed for sale for \$95,000.00. Scavuzzo confirmed through owner Natalie Bauman that Bauman had purchased a ½ share of this book from a store called Between the Covers. Scavuzzo was able to track this book back even farther and learned that Between the Covers purchased the book from Bartleby's Books at a book show in 2015. Bartleby's purchased the book from John Schulman at Caliban Books. Scavuzzo was told by Bauman that the book was currently at their New York location and would be taken offline and sent back to their Philadelphia office pending resolution of their inquiry. Shortly after this conversation, Scavuzzo received a telephone call from a male who identified himself as John Schulman. Schulman told her that in the late 1990's, he purchased a couple of vans full of books from the Carnegie Library. She asked him who he purchased them from and he said Sheila Jackson. He said that there were many boxes that he purchased and he didn't even know what all was inside of them. He said four years ago, he realized that this book ("De La France et des etats-Unis") was in one of the boxes. He called Greg Priore and asked him to withdraw the book and Priore said that he could not do this. Schulman said that there are other boxes that he has not opened. He added that he bought the books in good faith and

paid the library for what he purchased. He said that he would look for the cancelled check. Schulman told Scavuzzo that he would send her a list of CLP deaccessioned books that he had in his inventory from purchases he made over 20 years ago.

On July 25, 2017, Schulman emailed Scavuzzo a sample list of four deaccessioned CLP books still in his possession. Of those four listed, Scavuzzo identified these three being listed in the 1991 Oliver Room appraisal and currently listed as missing in the 2017 appraisal:

1. Rio, Antonio del. "Descriptions of the Ruins of an Ancient City"
2. Russell, Alex "The Natural History of Aleppo"
3. Pettus, John "Fodinae Regales or the History...of Chief Mines of England"

EXECUTION OF SEARCH WARRANTS

On Thursday, August 24, 2017, Allegheny County District Attorney's Office detectives executed search warrants simultaneously at Priore's residence, at the Caliban Book Shop, and at the Caliban warehouse. Based on information obtained during the execution of those initial warrants, detectives obtained a fourth search warrant for Schulman's residence on that same date.

Search of Priore's residence

Present during the search, Priore consented to be interviewed by detectives about his interactions with Schulman. Priore stated that approximately three or four years ago, Schulman approached him and said he had received a French book ("De La France et des etats-Unis") signed by Thomas Jefferson that had somehow been included with a large group of other books legitimately sold by the library from CLP's West End storage facility. The book was not deaccessioned and Schulman needed a withdrawn stamp on it before he could sell it. Priore was asked if he had given this book to Schulman to sell. Priore initially denied that he had given this book to Schulman to sell; however, several minutes later admitted, "I gave him (Schulman) the book." Priore explained that he removed the "De La France et des etats-Unis" from the Oliver Room and gave it to Schulman to sell. At the time that he had given the book to Schulman, Priore had not realized the book was signed by Thomas Jefferson. Schulman later contacted him and advised him of the Jefferson signature. Because the book was not

stamped "withdrawn", Schulman made up the story about purchasing the book from the West End because he needed it stamped in order to sell it. Priore stated that Schulman asked him to write a letter from the library stating that the book had been deaccessioned. Priore admitted giving Schulman several sheets of CLP letterhead stationery to Schulman, along with some of the verbiage to use in the letter. According to Priore, Schulman wrote the deaccession letter to validate the sale of the book. Initially Priore believed that he signed the letter for Schulman. However, after reviewing a copy of the letter Priore did not believe that he had signed the letter because the signature did not appear to be his own. He also stated that he only received about \$1,000.00 for this book when he sold it to Schulman. Priore stated that this was the only instance he is aware of that a fake letter was created to justify the sale of an item taken from the Oliver Room.

Priore further stated that back in the late 1990's (1997, 1998 or 1999) he approached Schulman about selling some things from the Oliver Room, and Schulman agreed to do it. This was the time period in which Priore and Schulman began working together to surreptitiously remove and sell items from the Oliver Room. Priore would remove maps, plates and books from the Oliver Room and Schulman would buy them from him and sell them through Caliban. Priore was unable to recall what he first gave Schulman to sell; however, he believes it may have been a map. Priore explained that he would remove maps and plates from books held within the Oliver Room. Some books were in poor condition and the maps or plates would easily come out and sometimes he would use an x-acto knife to remove them from the books.

When removing items from the Oliver Room, Priore stated that he did not always conceal removing items from the premises. If it were a small map or plate he would place it in a manila folder. If it were a large map or plate he would simply roll it up and carry it out; and with books he would just carry them out.

Priore further stated that since the library is located a block away from Caliban Book Shop and he passes it on his way home from work, he would stop by on his way home and personally give the item(s) to Schulman to sell. The agreement that he and Schulman had was that Priore would be paid up front. Priore stated that most often Schulman would pay him using a Caliban check. On rare occasions, Schulman would

pay him in cash. Sometimes Schulman would immediately give Priore a check and other times Priore would have to wait a few days before he was paid. When asked how much money he would receive for an item that he took from the Oliver Room and provide to Schulman to sell, Priore said he would only receive \$500.00 to \$3,000.00, depending on the item. It was Priore's belief that Schulman received significantly more money when he sold the item and that he was only receiving about half of the worth of the item sold.

Occasionally Schulman would text or call Priore at work or on his cellular phone and make requests for specific items from the Oliver Room. Priore would then comply with Schulman's request and supply that item. Sometimes Schulman would tell him that he needed a specific subject because he was going to a book fair. Priore stated that although he initiated contact with Schulman back in the late 1990's, as the years went by Schulman got very comfortable asking him to remove specific items from the Oliver Room. On a few occasions Schulman returned books back to Priore when the books were found to have no value. There were also times when Priore would take an item from the Oliver Room to sell to Schulman if he was in need of money.

When asked how often he would sell Oliver Room items to Schulman, Priore stated it would depend, sometimes it was several times a month or he would go months without selling Oliver Room items. Priore believed that the last time he sold Oliver Room items to Schulman was in December 2016. When asked why, Priore stated that in September of 2016 he learned that an appraisal was due to take place in 2017. After learning of this information, Priore notified Schulman about the pending audit. Following that conversation, Priore and Schulman spoke about trying to cover things up. Priore stated that he told Schulman, "I'll take the blame." According to Priore, Schulman replied, "No, I was in on it too."

Priore was asked if he was able to recall how many items he took from the Oliver Room since the late 1990's. He stated "several hundred items over the years." Priore estimated that Schulman paid him somewhere between \$40,000.00 and \$50,000.00 for items that Priore had removed from the Oliver Room.

A separate search warrant was executed on Priore's PNC Bank checking account on October 3, 2017. Records were requested for the time period of January 1,

2010 through September 1, 2017. Your Affiant reviewed these banks records and found that Priore received 56 checks made payable to him from the Caliban Book Shop account in the amount of \$117,700. (Documented book purchases by Caliban from CLP for this same time period totaled \$10,055.00, with payment made directly to CLP.) The first check was issued on October 24, 2011 and the last check was issued on March 6, 2014. Your Affiant also reviewed cash deposits into this account. For cash deposits greater than \$200, Priore deposited over \$17,000 in cash into his account between the dates of November 29, 2010 through July 5, 2017.

Priore stated that he did not use the money to go on vacation; he used it to stay "afloat" and to pay rent and school tuition for his children. Three of his children attend Duquesne University and his youngest daughter attended Ellis School for Girls.

Priore admitted having no authority to deaccession books and that the decision to do so was at the discretion of the Board. He stated he took the items from the Oliver Room to "help John out". Priore chose items from the Oliver Room to give to Schulman to sell if Priore felt they had value. He was unable to recall exactly what he took because he would just grab stuff off of the shelf. Priore denied ever selling other items to any other book dealers, and stated he only sold to Schulman. Priore admitted knowing there would be "fallout down the line" from his actions. Priore stated, "I should have never done this. I loved that room, my whole working life, and greed came over me. I did it, but Schulman spurred me on." Priore alleged that Schulman "goaded" him on and that Schulman made significantly more money than he did in the sale of the items from the Oliver Room. Priore explained that he took a lot of maps and pictures – in all possibly 200 items – from the Oliver Room. Priore then stated "You got me, I screwed up." He also stated, "Please tell Mary Frances I am sorry and I let the whole place down."

Search of Caliban Book Shop

Present during the search of the book shop was manager Kristofer Collins. Collins stated that no business records were kept in the bookstore, but believed that those records were either at the warehouse or Schulman's residence. Collins advised that Schulman's wife Emily Hetzel was the bookkeeper for the business and worked

from the Schulman residence where she could remotely access and view the shop's transactions. As the manager, Collins stated that he could and did purchase contemporary books (published within the last 100 years) from walk-in customers, but would refer anything older directly to owner John Schulman. Collins stated that the bookstore did not usually offer valuable books for sale, with their most valuable books being first editions priced at somewhere between fifty and two-hundred dollars. Collins stated that Caliban online sales all take place through the Caliban Warehouse in Wilkinsburg.

Search of Caliban warehouse

Due to the size and scope of the warehouse, which encompassed both the first floor and full basement areas, the execution of the search warrant lasted from Thursday, August 24, 2017 through Friday, September 1, 2017. The search required the examination of the contents of multiple rows of bookshelves; loose stacks and piles of books, plates, maps and papers found on top and within the bookcases, and on the floor. The contents of the basement, consisting of similar setup and contents to the first floor, suffered from large areas of water damage, dampness and/or mold. Items stolen from the Oliver Room were recovered from both the first floor and basement.

- Photograph "Attachment #6" depicts shelves within which loose plates and maps identified as having been removed from CLP books were discovered intermixed with random other materials.
- Photograph "Attachment #7" depicts an example of the conditions discovered within the Caliban warehouse.
- Photograph "Attachment #8" depicts the Part Four of a series "Ancient Egypt", labeled with Priore's name and "Oliver Room" taped to the outside cover. Although not identified within the 1991 appraisal, this book also contained CLP markings.

Appraiser Christiana Scavuzzo's presence was requested by investigators in order to utilize her expertise and to assist detectives in identifying items removed from the Oliver Room.

Among the cannibalized items located and seized at the warehouse were:

1. 1 Herman Moll "Atlas Manuale" map;
2. 15 Nicolaus Visscher "Atlas Minor" maps;
3. 26 Piranesi [Opere] plates;
4. 8 Emanuel Bowen "A Complete System of Geography" plates;
5. 16 Jodocus Hondius & Gerard Mercator "Atlas, sive Cosmographicae Meditationes" maps;
6. 33 Jean Palairer "Atlas Methodique" maps;
7. 5 Jodocus Hondius & Gerard Mercator "Atlas Sive Cosmographicae";
8. 7 Jan & Willem Blaeu "Theatrum Orbis Terrarum" maps;
9. 2 of 5 titles, disbound Edmund Burke "Collection of Five Pamphlets";
10. 3 of 6 titles, disbound Joseph Tucker "Collection of Six Pamphlets";
11. 10 Ferdinand Ruggeri "Scelta di Architetture Antiche e Moderne Della Citta di Firenze" plates;
12. 13 Bernardo Sansone Sgrilli "De Ortu & Causes Subterraneorum lib. V; De Natura Eoru, Quae Effluunt ex Terra lib. IV; De Natura Fossilium lib. X; De Veberibus & Novis Metallis lib. II; Bermanns; sive, De re Metallica Dialogus" plates;
13. 2 John Ogilby "America... The Latest and Most Accurate Description of the New World" plates;
14. 23 Thomas Jefferys "A Description of the Maritime Parts of France" plates;
15. 4 George Henry Mason "Costume of China" plates;
16. 7 George Edwards "Natural History of Uncommon Birds...." plates;
17. 7 Bartolomeo Pinelli "Opera de Costumi Italiani" plates;
18. 91 Edward S. Curtis "The North American Indian..." plates

Among the whole items located and seized at the warehouse were:

1. Carlo Giuseppe Fossati "Tempio Malatestiano de'Francescani di Rimino, Architettura de L. B. Alberti";
2. Antonio del Rio "Description of the Ruins of an Ancient City....";
3. Pietro Cataneo "L'Architettura";
4. Isaac Newton "Philosophiae Naturalis Principia Mathematica" 1803;
5. Isaac Newton "Philosophiae Naturalis Principia Mathematica" 1833;
6. Pierre-Daniel Huet "Traitte de la Situation du Paradis Terrestre. A Messievr de l'Academie Francoise";
7. Sebastianus Theodoricus "Novae Quaestiones Sphaerae";
8. Johannes Coler "Oeconomia oder hausbuch"; "Liber Quodlibetias (1606) Trambuch Apomasans";
9. Jean Philippe Rameau "Nouveau Systeme de Musique Theorique"; "Traite de L'Harmonie";
10. Claude Barthelmy Morisot "Orbis Maritimi Sive Rerum in Mari et Littoribus";
11. John Pettus "Fodinae Regales or the History... of Chief Mines in England";
12. Bartholomaeus Wagner "Hundert Alldachtiger Gottseliger Und Katholischer Lehrreicher";
13. Pierre Patte "Memoires sur les Objects les plus Importans de l'Architecture";
14. Andrea Palladio "First Book of Architecture...";
15. Pierre le Muet "Maniere de Bien Bastir Pour Toutes Sortes de Personnes...";

16. Herodianus "De Imperatorum Romanorum Praeclare Gestis Libri VIII";
17. John Calvin "Four Works Bound Together";
18. Alex Russell "The Natural History of Aleppo";
19. Johann Joachim Becher "Physica Subterranea Profundam Subterraneorum";
20. Gilles Menage "In Diogenes Laertium Observationes & Emendationes...; Quibus Subjungitur Historia Mulierum Philosopharum Eodem Menagio Scriptore; Accedunt Joachimi Kuhnii In Diogenem Laertium Observationes...Amstelaedami";
21. Saint Francis de Sales "Practica del Amor de Dios";
22. Jean Chrysostome Magnen "Exertationes de Tabaco";
23. Basilius Valentinus "Chymische Schriften"
24. Aldus "Historiarum Libri VIII"

All of these items were identified within the PMAA list as having been stolen or cannibalized from the Oliver Room, with a PMAA-assigned replacement value of \$258,945. These items were logged as evidence then returned to the Oliver Room. Detectives also recovered a rubber "withdrawn" stamp and boxes of sales receipts. During his interview at the warehouse, Schulman explained that after he realized that many of the books from his previous 1999 Carnegie Library purchases had not been stamped "withdrawn" he purchased his own withdrawn stamp and only stamped 6 (six) or 7 (seven) of the books. Schulman said he felt that the practice of stamping books was not the correct thing to do so he stopped doing it. Schulman advised that he had not used the stamper in years and he did not have it anymore. When shown the stamper located and seized during the search, Schulman identified that particular stamper as the one he used to stamp the 6 (six) or 7 (seven) books from the Carnegie Library).

- Photograph "Attachment #9" of a book stamped with "Withdrawn from Library" in red ink, discovered within the Caliban warehouse.

Scavuzzo later took each map and plate recovered from the warehouse and placed them in the cannibalized books that were left behind in the Oliver Room. Scavuzzo was able to match maps and plates which were removed from these books based upon matching the tear marks and/or matching page stains or discolorations. Examples of these maps and plates that were pieced back together to their original bindings are attached to this affidavit as:

- Photograph "Attachment #10" a Bowen map, torn in two.
- Photograph "Attachment #11" a Bowen map close up match of a page recovered from Caliban warehouse with the book remains located within the Oliver Room.

There were also several Edward Curtis prints found during the search of the warehouse, which were seized and returned to the Oliver Room. The actual Curtis books were not removed from the Oliver Room. The prints were instead removed from the books, rendering the actual book a total loss. These works, according to the appraisal done by PMAA, are 'A monumental work. Curtis' North American Indian Portfolio is considered the finest and most valuable ever done on the American and Alaskan Indian and Eskimo'.

During the warehouse search, Detectives also seized numerous sales receipts of items sold by Caliban. Among those recovered sales receipts, detectives noted 54 additional items that matched the list of items stolen/cannibalized from CLP's Oliver Room. Your Affiants reviewed the sales receipts which reflected that forty-two (42) Curtis prints were sold by Caliban from May 21, 2009 through July 16, 2009.

Detectives also compared these sales receipts taken to the list of items that were illegally removed from the Oliver Room. Among those items were:

Date	Name	Title	Amount sold
2/15/13	Peter Harrington	Serlio	\$18,000.
4/14/13	Maggs	Atlas	\$1,250.
4/4/14	Maggs	Pliny 1498 (Plinius Secundus)	\$2,200.
5/26/09	Paul Belotti	Curtis print Cheyenne Young Woman	\$145.
5/29/09	Shawn Ufer	Curtis prints Gathering Catus Fruit, Firing Pottery, Sifting Basket, Havchach Weaving,	\$776.77

		Kalispel Camp, Atsina Camp, Setting the Net	
7/13/09	Shawn Ulfer	Comanche Footwear, In Santa Clara, Whale Hunt, Hunting Basket, On Russian River, Sia Footwear, Umiak Crew, Birchback Basket	\$586.
7/7/09	Marian Marin	Curtis print Skokomish Camp	\$111.62
5/21/09	John Terry	Curtis Print Mat Shelter- Skokomish Maternity Belt- Apache	\$350.
5/22/09	Larry Davis	Curtis Print An Old Woman	\$120.
5/26/09	Stephen Rodzevik	Curtis Print Return to the Faster's Lodge	\$139.50
5/26/09	Melissa Flury	Curtis Print The Sun Dance Votary	\$127.50
5/27/09	Bruce Kapson Gallery	Curtis Print In the Forest	\$150.
5/26/09	Michael Rubenstein	Curtis Print Pomo Baskets	\$85.
7/16/09	Michael Rubenstein	Curtis Print Animal Designs in Yokuts Basketry, Mono Basketry	\$131.
5/27/09	Mark Podlin	Curtis Print 1000 Miles up the Nile	\$83.50
7/7/09	Thomas Hutchinson	Curtis Print Homeward Bound	\$80.
7/13/09	John Durbin	Curtis Print (not sure of names)	\$440.
7/5/09	John Durbin	Curtis Print Elk-Horn Spoons	\$60.

7/7/09	Kim Housken	Curtis Print Dessert Cahuilla	\$61.
7/7/09	Curt von Diest	Curtis Print Umiak Frame	\$61.
7/6/09	John Halbur	Curtis Print Mush Bucket	\$131.50
7/5/09	Scott Trebatoski	Curtis Print Zuni Pottery	\$77.
6/18/09	Gary Graves	Curtis print Haida Shaman Slate	\$250.
8/3/15	Philip Curtis		
6/9/09	Ross.com	Piranesi print 20 copperplates Pompei	\$356.
6/14/09	Luis Atienza Salas	Piranesi print Dedication plate to Clement	\$261.
6/3/09	Luis Atienza Salas	Piranesi print Inscriptions on Fabricius Bridge	\$200.
5/23/09	Saveliy Chelombiev	Piranesi print Remains of Arcades, Buttresses of the Mausoleum of Hadrian	\$150.
4/16/12	Ken Karmiole	Hugonis de Sancto Victore, Laertius Vitae Aldus	\$2,000. \$3,750.
11/19/13			\$800.
8/17/12	Bickerstaff Books	An Impartial History of the War in America	\$200.
9/17/13	Thomas Edsall	A Defence of the Constitutions of Government	\$7,500.
10/30/13	Bauman Books Zilpath Feiser	Transactions of the American Philosophical Society	\$3,000.
7/15/13	Bartleby's	Newton Principia Les Etats Unis Tanner Map	\$95,000. \$5,000. \$1,300.
7/21/16	Don Heald	Journal of the Voyages and Travels...	\$1,500.
12/16/16	Patrick Graham	Notitia Ultraque cum Orientis	\$1,800.

4/12/12	Alexandre	Print lot Antiphonal Tanner-New England French Atlas	\$2,000. \$2,000. \$250.
3/10/17			\$2,800.
6/27/16	Cleveland Library	Signatures of US Senators	\$2,240.
11/11/11	Imperial	Horace (other works)	\$2,800.
6/2/09	Eric Johnson	The Decameron	
4/11/13	Karmiole Bookseller	Luther- Etliche	\$1,000.
4/11/13	Ken Lopez	Bowles	\$1,850.
	University Archives	Autograph Album	\$32,500.
7/21/14	Waiting for Godot Books	Pamphlet Series 1	\$320.
11/15/13	Peter Stern	Common sense	\$15,000.
4/30/15	Bauman Ernest Hilbert	Some Considerations...	\$800.
12/6/01	Mark Saab	Manners, Customs and Condition of the North American Indian	\$100.
12/7/01	Joel Oppenheimer	American Ornithology	\$1,500.
11/5/01	Lawrence Birnbaum	Original Water color paintings John James Audubon	\$75.
8/23/17	Thomas Crompton	History of the Indian Tribe	\$150.
10/11/01	Kate Knudson	2 works from Edmund Burke and John Hawkesworth	\$500. \$200.
9/27/01	Sean Keilen	Noctium Atticarum	\$150.
9/13/00	Harm den Boer	Piratas De La America	\$1,100.

The contact information for the buyers listed above is known to your affiants.

Search of Schulman's Residence

Based on information provided by employees at the Caliban Book Shop, a

search warrant was obtained for and executed at Schulman's residence. Among the items located and seized were 3 Piranesi plates identified within the PMAA appraisal list as having been cannibalized and stolen from the Oliver Room.

viaLibri

viaLibri.net is a website featuring an online search engine for old, rare and out-of-print books for sale worldwide. During the course of this investigation, investigators contacted Managing Director James A. Hinck requesting records or information related to items listed for sale by Caliban Books and/or John Schulman as recorded by viaLibri with which to compare to the list of stolen items from CLP Oliver Room. Hinck provided a list of books searched or located by viaLibri related to Caliban Books. Among those items Hinck provided were the following items matching those listed as having been stolen from the Oliver Room:

1. Georg Agricola, Vom Bergkwerck XII Bücher : darinn alle Empter, Instrument, Gezeuge unnd alles zu disem Handel gehörig mit schönen figuren vorbildet und klärlich beschriben seindt...(First German edition of De Re Metallica 1556) seen on 7/15/2013;
2. Johann Ludwig Gottfried, "Neue Welt und Americanische Historien", seen on 7/10/2013 and 8/5/2013;
3. Georg Agricola, De Re Metallica libri XII: quibus officia, instrumenta, machinæ, ac omnia denique ad metallicam spectantia non modo luculentissimè describuntur, sed & per effigies suis locis insertas adjunctis Latinis Germanicisq. appellationibus ita ob oculos ponuntur ut clariùs, seen 12/24/2012;
4. Geoffrey of Monmouth, Britannie Utriusque Regum Et Principum Origo Et Gesta Insignia Ab Galfrido Monuemutensi / Britan[n]ie utriusq[ue] regu[m] / Britanie utriusq regu ... (1508), seen 6/3/2014, 12/3/2014, 12/8/2014, 12/20/2016;
5. Nicolaus de Ausmo, Supplementum Summae Pisanellae et Canones poenitentiales fratris Astensis et Consilia Alexandri de Nevo contra Judaeos Foenerantes, seen 12/22/2012;
6. Anton Cordova Villalta, citizen of Mojon de la Frontera; Spanish Patent of Nobility; Carta Ejecutoria de Hidalguia, Hidalgo; King Philip II, Patent of Nobility

- (Carta Ejecutoria de Hidalguia) for Anton Cordova Villalta, citizen of Mojon de la Frontera. Granada 5 May 1595, seen 1/10/2014, 1/13/2014, 1/17/2014;
7. Lewes Roberts, The Marchants Mapp of Commerce, seen 7/6/2013, 9/1/2013, 9/6/2013;
 8. Franklin, Ben, John Wilkes, J. Almon (ed), et al, The Political Register, and Impartial Review of New Books for MDCCLXVII (1767) Vol. I and Vol. III (1768), seen 9/19/2013;
 9. Edmund Burke, Bertie Willoughby, John Horne Tooke, William Pitt, 4 British Pamphlets on Edmund Burke, American Colonies, American Revolution: 1. The Earl of Abingdon (Bertie Willoughby), Thoughts on the Letter of Edmund Burke...to the Sheriffs of Bristol. 4th ed, 1777. 2. Sppech of Burke at the Guildhall in Bristol Previous to the late Election... 1780. 3. (Tooke) Facts: Addressed to the landholders, stockholders, merchants, farmers... 2nd Edition, 1780. 4. (Pitt) Earl of Chatham. Genuine Abstracts from Two Speeches of the late Earl of Chatham; and his reply to the Earl of Suffolk. London, 1779, seen 12/14/2013;
 10. William Moyneaux, Dioptrica Nova: A Treatise of Dioptricks in Two Parts, seen 3/30/2013 and 8/14/2013;
 11. Tyrtaeus); (John Wilkes), Spartan Lessons; or, The Praise of Valour; in the Verse of Tyrtaeus. inscribed by John Wilkes, seen on 12/19/2013 and 1/7/2014;
 12. Pedro Gonzales Gil, citizen of Bejar; Spanish Patent of Nobility; Carta Ejecutoria de Hidalguia, Hidalgo; King Philip III, Patent of Nobility (Carta Ejecutoria de Hidalguia) for Pedro Gonzales Gil, citizen of Bejar, Valladolid, 28 June 1610, seen 1/12/2014;
 13. Delorme, Philibert, Nouvelles inventions pour bien bastir et a petits fraiz, trouvees n'agueres par Philibert de L'orme Lyonnois, architecte, conseiller & aumosnier ordinaire du feu Roy Henry, & abbe de S. Eloy lez Noyon, seen on 6/23/2013 and 8/18/2013;
 14. Urstisio, Christiano / Christian Wurstisen, Michael Maestlin, Purbachius, Georgius von, 1423-1461 / Georg von Peurbach or Purbach, Quaestiones in theoricis Planetarum Georgii Purbachii [bound with] Theoricae Novae Planetarum Georgij Purbachij, seen 12/28/2012 and 7/15/2013;

15. Bible; Geneva Version; Robert Barker, The Bible: That is, the holy Scriptures contained in the Old and New Testament (1611), preceded by The Book of Common Prayer (1611). together with a disbound copy of The Book of Psalmes (1612), seen 12/24/2013;
16. Almon, J.; (Benjamin Franklin), The Political Register, Volume 1, 1767 and Volume III, May-December, 1768, seen 5/13/2014;
17. Morris, Gouverneur, Henry Lee, George Richards Minot, Samuel Miller, Peter Thacher, Samuel Tomb, Ebenezer Grant Marsh, George R. Burrill, Samuel Stanhope Smith, Walter King, William Linn, William Jackson, December 29, 1799 occasioned by the death of General George Washington. 4. Minot, An Eulogy on George Washington. 5. Thacher, A Sermon occasioned by the death of General George Washington. 6. Tomb, An Oration on the Auspicious Birth, Sublime Virtues, and Triumphant Death of General George Washington. 7. Marsh, An Oration delivered at Wethersfield February 22, 1800... 8. Burrill, An Oration pronounced at the Baptist Meeting House in Providence... 9. Smith, An Oration upon the Death of General George Washington. 10. King, A Discourse delivered in Chelsea in the city of Norwich, Jan. 5, 1800... 11. Linn, A Funeral Eulogy occasioned by the death of... 12. Jackson, Eulogium on the Character of General Washington... 13. (Anonymous) An Oration, in Memory of, seen 7/14/2016;
18. Rampegollis, Antonius De, Biblia Aurea, seen 1/5/2013;
19. Petrarch; Francesco Petrarca, De Remediis Utriusque Fortunae, seen 12/22/2012;
20. Vascellini, Gaetano (1745-1805), Statue e Gruppi in bronzo e in marmo, che sono in Firenze alla vista del Pubblico, disegnate e incise da Ga. Vascellini Bolognese in Firenze MDCCLXXVII (1777) - Parts One and Two, seen 8/7/13;
21. William Whittingham, Anthony Gilby, Thomas Sampson, Geneva / Breeches Bible, 1615; The Bible, Translated According to the Hebrew and Greek [together with] Two right profitable and fruitfull Concordances... [and] The Whole Booke of Psalmes... (1616), seen on 12/24/2012;
22. Robert Boyle, Some Considerations touching the Usefulness of Experimental Naturall Philosophy, seen 5/12/2013 and 7/21/2013;

23. Joseph Priestley, Experiments and Observations on Different Kinds of Air (3 volumes) and Experiments and Observations relating to various branches of Natural Philosophy, with a Continuation of the Observations on Air (3 volumes), seen 9/25/2013;
24. Joseph Scott, The United States Gazetteer: containing an authentic description of the several states (1795), seen on 1/16/2018;
25. Ubaldini, Petruccio; John Wolfe, Le Vite Delle Donne Illustri del Regno d'Inghilterra, & del Regno di Scotia, & di quelle, che d'altri paesi ne i due detti regni sono stato maritate: doue si contengono tutte le cose degne di memoria da esse, o da altri per i rispetti loro state operate, tanto di fuori, quanto di dentro de i due regni, seen on 8/15/2013;
26. Maturanzio, Francesco / Francisci Maturantii, Hoc in volumine haec continentur Francisci Maturantii Perusini de componendis carminibus opusculum / Nicolai Perotti Sypontini de generibus metrorum. Eiusdem de Horatii Flacci ac Seuerini Boetii metris. Omni boni Vicentini de arte metrica libellus. Seruii Mauri, seen on 3/31/2013;
27. Curtis, Edward, Desert Rovers - Apache. (Original Folio-Size Edward Curtis Photogravure), seen on 12/27/2012;
28. Curtis, Edward, Original Framed Curtis Photogravure: Big Ox – Apsaroke, seen 6/7/2014;
29. Edmund Burke, Speech of Edmund Burke on American Taxation. Also the Speech of the Right Honourable the Earl of Chatham in the House of Lords on Friday the 20th of January, 1775, seen on 8/21/2014;
30. F.N. Koenig, Nouvelle Collection de Costumes Suisses, d'apres les dessins de Mr. F. N. Koenig / Neue Sammlung von Schweizertrachten nach zeichnungen von F. N. Koenig, seen 5/18/2017;
31. Giovanni Battista Piranesi (1720-1778), Ruins of the Circus Flaminius..., from Il Campo Marzio dell' Antica Roma, Opera di G.B. Piranesi socio della reale società degli antiquari di Londra (The Campus Martius of Ancient Rome, the Work of G.B. Piranesi, Fellow of the Royal Society of Antiquaries, London),, seen on 5/1/2017;

32. Sheppard, Edwin; Thomas G. Gentry, Least Tern, Maryland Yellow-Throat, Painted Bunting, Prairie Warbler, Sparrow Hawk, Virginia Rail, Black-Crested Flycatcher, Chipping Sparrow, Kingbird, Cedar-Bird, Downy Woodpecker, Golden-Crowned Kinglet, Golden-Crowned Kinglet, Orchard Oriole, Red-eyed Vireo, Spotted Sandpiper, Wood Pewee, Catbird, all original plates from 'Nests and Eggs of Birds of the United States', seen 10/16/2016;
33. Anton Corvera Villalta, Carta executoria de hidalguia a pedimento de Anton Corvera Villalta vezino de la villa de Moron, seen on 6/22/2012;
34. Pedro Goncalvez Gil, Carta executoria de hidalguia en possession general a pedimento de Pedro Goncalvez Gil vezino de la villa de Vejar, seen on 5/12/2012;
35. Hugo de Sancto Victore, Hugh/ Hugonis; Hugues de Saint-Victor; Josse Clicthove, Hugonis de Sancto Victore: Allegoriarum in utrunque Testamentum libri decem, seen on 4/12/2012;
36. Thomas Matthews (pseudonym for John Rogers); William Tyndale, Richard Taverner, Edmund Becke, The Byble, that is to saye, all the Holye Scripture in whiche are contayned the Olde and New Testament (Bible), seen on 2/5/2012;
37. Diogenes Laertius, Vitae et sententiae philosophorum. "De Vita & moribus philosophorum.", seen on 4/16/2012;

Hinck also provided the contents of email communications from May 2017 in which Schulman requested that the ghost record for a book he had once sold be removed from viaLibri's website so that it would no longer appear in future Google searches. Hinck confirmed performing the requested deletion shortly after that request. According to Hinck, the item for which Schulman requested records be deleted was "Newton's Principia Mathematica".

The relevant portion of the email in which Schulman requested the "purge" reads as follows:

"Hi Jim,
the item in question:
https://webcache.googleusercontent.com/search?q=cache:tp5DsdwaG58J:https://services.vialibri.net/item_pg_i/488414-1687-newton-isaac-philosophiae-naturalis-principia-mathematica.htm+&cd=7&hl=en&ct=clnk&gl=us

(Sold to Harrington by me some years ago but now library under new management is protesting that I should not have bought it from them, and I'd like to protect Harrington and me from getting harassed while I sort it out)...

Thanks and thanks,
John S.

Hinck's relevant response to John was as follows:

"Hi John,

I have removed the ghost record from viaLibri, but I'm afraid I can't do anything about what is in the Google cache. They should now eventually remove it, but there is no way to know how long it will take. It is also possible that the same information is recorded elsewhere and has been archived indefinitely. The moving finger has gone digital and we will all soon have to adjust to the fact that anything that goes public on the internet will potentially stay public, and we will not be able to do anything about it. I personally am not troubled by this, but I know many people are..."

Through search warrants issued to Google, investigators located and confirmed the existence and content of the May 2017 email exchange regarding the "Newton" as described by Hinck. In addition, a previous April 2017 email thread was discovered in which Schulman requested Hinck remove viaLibri references to two additional books previously sold by Schulman. Those books were "Geoffrey of Monmouth and a 1925 Oscar Wilde collected writings limited large paper edition. These emails originated from Schulman's johneschulman@gmail.com and calibanbooks@gmail.com accounts. Hinck confirmed receiving those emails from Schulman as well.

Caliban Books Ebay/Paypal - "rarebookstore" warrants

On August 11, 2017, a search warrant was served on eBay Inc., requesting transaction records for Caliban Books online eBay store identified as "rarebookstore". On October 3, 2017, a subsequent search warrant was served on Paypal for payment records received.

In addition to the Geoffrey of Monmouth book previously mentioned, a review of the combined responsive data reflected multiple listings suspected as having originated from the items stolen from the Oliver Room.

For example, approximately 1,500 original Edward Curtis North American photographs were discovered missing. Caliban's Ebay/Paypal records reflect approximately 231 original Edward Curtis American Indian photograph Ebay listings, and 171 Paypal payments referencing original Curtis American Indian photographs. According to PMAA, none of these photographs would have been marked with CLP indentifiers.

A review of Caliban's prior Ebay listings reflected multiple listings matching names or descriptions of items stolen from the Oliver Room, including:

- Pettus, John / Fodinae Regales Or the History Laws & Places of the Chief 1st ed
- Rameau, Jean-Philippe / Nouveau Systeme de Musique Thoerique bound with Traite
- Russell, Alex / Natural History of Aleppo Syria & Partw Adjacent 1756 1st ed
- Giovanni Battista Piranesi 1720-1778 / 'Sezione prospettica dell Anfiteatro
- Giovanni Battista Piranesi 1720-1778 / 'Del Castello Dell Acqua Giulia original
- Giovanni Battista Piranesi 1720-1778 / Ruins of the Circus Flaminius from Il
- Piranesi / Year Book of the Boston Architectural Club Piranesi 1915 1st ed
- Giovanni Battista Piranesi 1720-1778 / 'Sezione prospettica dell Anfiteatro
- Giovanni Battista Piranesi 1720-1778 / 'Dimostrazione in Grande delle Parti del
- Giovanni Battista Piranesi 1720-1778 / 'Del Castello Dell Acqua Giulia original
- Giovanni Battista Piranesi 1720-1778 / Ruins of the Circus Flaminius from Il
- Giovanni Battista Piranesi 1720-1778 / 'Sezione prospettica dell Anfiteatro
- Giovanni Battista Piranesi 1720-1778 / 'Dimostrazione in Grande delle Parti del
- Giovanni Battista Piranesi 1720-1778 / Ruins of the Circus Flaminius from Il
- Description of the Ruins of an Ancient City Discovered Near Palenque 1822 1st ed
- Sigismund Gelenius; Albrecht / Notitia Utraque cum Orientis Tum Occidentis ultra
- C Plinii Caecilii Secundi Pliny the Younger / Epistolae et Panegyricus Classics
- Molyneux, William / Dioptrica Nova A Treatise of Dioptricks in Two Parts Wherein
- F N Koenig / Nouvelle Collection de Costumes Suisses d'apres les dessins de Mr F
- Volney, C F / View of the Climate & Soil of the United States of America 1st ed

A review of Caliban's prior Paypal listings reflected multiple listings matching names or descriptions of items stolen from the Oliver Room, including:

- 1598 Magini PTOLEMAIC MAP of CEYLON / SRI LANKA
- 1598 Magini PTOLEMAIC MAP of INDIA
- 1598 Magini gorgeous PTOLEMAIC WORLD MAP, very RARE
- 1598 Magini PTOLEMAIC MAPS OF THE BALTICS + SARDINIA
- 1598 Magini PTOLEMAIC MAPS OF TURKEY, BALTICS, GREECE
- 1598 Magini PTOLEMAIC MAPS OF SPAIN, ENGLAND, IRELAND
- 1598 Magini PTOLEMAIC MAPS OF GERMANY & FRANCE
- 1798 MAP, COUNTY OF SLIGO – HIBERNIAN ATLAS, IRELAND
- F N KOENIG, Nouvelle Collection de Costumes Suisses d'apres les dessins de Mr. F

Interviews

Jennifer Jarvis, a library employee in the early 2000's stated during this time she was working in the closed stacks area of the library one day and saw John Schulman looking at books with Priore. She knew that this area was closed to the public and was concerned as to why he was allowed in the area. She heard the two discussing plates that were inside of a book and how much they would be worth individually if removed from the book. Jarvis said that she was shocked by this discussion because she felt that you should not do that to these rare books.

Don Wentworth, a retired library employee who still works at the library as a fill-in stated he had been contacted on October 10, 2017 by Schulman, after this investigation became public knowledge, via Facebook Instant Messenger. Through Messenger, Schulman asked if Wentworth would speak to him about "the Carnegie library protocol for the deaccession of material in the 2000s" Wentworth declined, and advised Schulman that as a current employee of the library, he would feel very uncomfortable discussing that issue.

On April 7, 2018, Patrick Dowd was in the Caliban Book shop and could hear Schulman speaking to an unknown individual on the telephone. Schulman was talking loud enough that he could hear the conversation. The topic that he was discussing sounded similar to the Carnegie Library case that he knew of since he is a Board member. He did not know that Schulman was the target of the investigation at the time

that he was in the store. The following are some of the statements Dowd overheard Schulman say:

- "If it doesn't come to that much I can just settle it," and said that his parents have money to help in the future
- Library ran sloppily and they will need to answer for what happened
- He seemed dismissive of "the librarian" and said he will be the person to blame since he has assets
- The Allegheny County DA is not interested in any deal because he wants to make this political
- He is worried about his wife and said that she is angry at him for dealing with this guy and accepting whatever he was told
- Said that the Jefferson didn't come from him -- that is rare

Recovered Books

The following items have been recovered and returned to CLP during the course of this investigation:

1. A Defence of the Constitutions of Government 1787, John Adams

This book was purchased from Caliban for \$6,775.00 by 19th Century Rare Books and Photograph Shop on September 17, 2013. The amount paid to Caliban. Your Affiant interviewed Thomas Edsall, owner of the store, who read the description of the book belonging to CLP and said that what he purchased matched that description. Edsall added that it appeared that the bookplate had been removed prior to him purchasing the book. Edsall still had this book in his possession and returned the book to the District Attorney's office.

2. Notitia Utraque cum Orientis Tum Occidentis 1552

This book was purchased from Caliban for \$1,800.00 by Pitts Theology Library at Emory University on December 16, 2016. Your Affiant interviewed Bo Adams, interim Director at the library, who stated that they were still in possession of this book. Adams stated that the Carnegie Library bookplate was still on the inside cover of the book. Adams subsequently returned this book to the District Attorney's office.

3. Philosophiae Naturalis Principia Mathematica 1687, Newton

This book was jointly purchased from Caliban for \$95,000.00 by Bartleby's Books and Peter Harrington, a London book dealer, on July 15, 2013. The book was then sold to a private buyer in the amount of £145,000 (approximately \$191,510.00). The private buyer has since returned the book to Harrington, who in turn returned the book to the District Attorney's office. The private buyer has also been reimbursed for her loss by Peter Harrington.

Your Affiant interviewed John Thompson, owner of Bartleby's, and was told that he questioned Schulman about the sale of the Newton. Thompson said that there were

Carnegie Library markings inside of the book. He was told by Schulman that the library had a duplicate copy of this book. Schulman purchased another book that belonged to Carnegie Library on the same date and was given a letter purportedly from the library that they book had been deaccessioned. Thompson said that he trusted that since the other book had been deaccessioned by the library that he had the authority to sell the Newton as well.

4. De la France et des Etats-Unis, 1787 signed by Thomas Jefferson

This book was purchased from Caliban for \$5,000.00 by Bartleby's Books on July 15, 2013. This book has since been resold to two separate book dealers. The last buyer was Bauman's Books. It was discovered during this investigation that the book was listed for sale on the internet through Bauman's. Bauman's was informed that this book was stolen from the Carnegie Library and pulled the book from their website.

Detectives interviewed owner Natalie Bauman and her associate Corinne Weeks. Bauman explained that the signed Thomas Jefferson book was originally purchased by Bartleby Books from Caliban Books. Bartleby Books then sold the book to Between the Covers. Between the Covers then sold ½ a portion of the book to Bauman Rare Books for \$18,000.00. Bauman in return split this cost with University Archives, so they each owned a quarter of the book. The breakdown is as follows; Bauman owns 25%, University Archives owns 25% and Between the Covers owns 50% of the signed Thomas Jefferson book.

In an email correspondence to CLP dated July 28, 2017, attorney Joseph L. Luciana III, representing Caliban Books at that time, asserted that the book *De la France et des Etats-Unis* was officially withdrawn from Carnegie Library as part of a "general deaccession" during the years 1999-2000. Luciana further asserted that Caliban Books lawfully purchased this book directly from Carnegie Library, and later sold it to a third-party purchaser. Attached to Luciana's correspondence was a copy of a single page memo on Carnegie Library of Pittsburgh letterhead. ("Attachment #12"). This March 5, 2014 memo, purportedly authored by Greg Priore, alleged confirmation by Priore that *De la France et des Etats-Unis* had been officially withdrawn from Carnegie Library as part of a "general deaccession" during the years 1999-2000.

Examination of this single page memo sent by Luciana revealed that the CLP header and footer were not in alignment with the typed body of memo itself. This is a strong indication that the two portions were not from the same original document at the time the attached copy or scan was created. In the event that the document was copied or scanned at an angle, the document in its entirety would be consistently crooked. Instead, the appearance of this memo is consistent with a fabricated "cut and paste" document, wherein the creator attempts to create the appearance of an authentic original document by copying two separate documents into one.

Bauman was asked about the book titled "Transaction of the American Philosophical", she explained there are two volumes to this collection, but that Bauman and Weeks only had purchased one volume several years ago from Caliban Books. They then sold the book to an unidentified client.

Bauman and Weeks were asked about a Caliban Books invoice number 5975 (discovered during the execution of search warrants) related to their purchase of the book "Some Considerations" by Boyle from Caliban Books. According to Bauman and Weeks, this book had been purchased but was later returned, most likely as the book may have been damaged.

Bauman also turned over the signed Thomas Jefferson book to detectives, along with an accompanying original deaccessioned letter purportedly signed by Greg Priore.

Weeks subsequently provided copies of three (3) invoices of items purchased from Caliban:

1. Invoice #4194, dated 10/20/2013, Caliban to Bauman Rare Books for Transaction of the American Philosophical Society in the amount of \$2,410.00.
2. Invoice #647046, dated 2/11/ 2014, Between the Covers to Bauman Rare Books for ½ a share of the Jefferson in the amount of \$18,000.00.
3. Invoice #74270, dated 4/12/2013, The University Companies to Bauman Rare Books for ½ a share of Some Men of Fame Autographs in the amount of \$16,250.00.

5. Biblia Lintina (Magna) 1520, S. Guerardi

This book was purchased from Caliban at the New York Antiquarian Book Fair for £10,000 (\$13,207.00) by Maggs Bros Ltd. of London on April 12, 2012. Maggs subsequently returned this book to the District Attorney's office.

6. Epistolae 1498, Plinius Secundus

This book was purchased from Caliban at the New York Antiquarian Book Fair for \$2,200.00 by Maggs Bros Ltd. Of London in April, 2014. Maggs subsequently returned this book to the District Attorney's office.

Detectives interviewed Maggs Bros. Director Jonathan Reilly, who advised that he and Maggs Bros. have had a number of dealings with John Schulman dba Caliban Books. Reilly advised that he would normally see Schulman at ABAA book fairs in the USA, specifically those in New York, California and Boston. Reilly stated that he and other vendors, including Schulman, would also buy and sell amongst themselves as well as to the general collecting public at these events. Reilly

described Caliban Books as a “generalist” seller as opposed to a specialist. As such, Reilly advised that the opportunity to purchase items from Caliban Books would present opportunities to resell the items for a profit. Reilly also stated that he never suspected anything sold by Schulman had been stolen. Reilly advised that when purchasing from an established book dealer like Schulman, buyers (himself included) relied on Schulman to have done a due diligence search regarding the pedigree of items offered for sale.

7. Britanniae Utriusque Regnum Et Principum 1508, Geoffrey of Monmouth

This book was purchased through Ebay from Caliban by Ittai Gradel of Denmark on January 31, 2017. The ebay listing price was \$5,175.00. Gradel offered \$4,000, which was accepted by Caliban.

When contacted by detectives, Gradel related he also corresponded via email with Seth Glick, Caliban online sales manager regarding shipping arrangements and the book’s history. Gradel questioned Glick regarding the book’s deaccessioning from Carnegie Library and if Caliban bought the book directly from the Library. On February 3, 2017, Glick advised Gradel that Caliban purchased the book directly from Carnegie Library, and that “We often work with them when they deaccession older books. We bought this one about 5 years ago but marketed it offline for a few years first...”

Gradel also provided one of the book images posted as part of the original ebay listing. Included in the photo was a “Withdrawn from Library” stamped in red located in the upper left corner of the page, and a bronze clasped set of hands used to hold book pages in place. (During the execution of the search warrants at the Caliban warehouse location, both the stamper believed to have been used and the bronze clasped set of hands were located and seized.)

Gradel has since returned this book to the District Attorney’s Office on July 2, 2018.

Corrections to Initial PMAA List of Stolen/Damaged Items

During the initial stages of this investigation, detectives utilized a list created by PMAA auditors based upon their initial assessment of the Oliver Room which identified items believed to have been removed or damaged. Since the 2017 Pall Mall audit which generated that list of lost or damaged books incorporated within search warrants executed in this investigation, the Oliver Room has remained closed to the public. Pall Mall employees were also tasked with reorganizing the *entire* contents (20,000 - 30,000 books) into the organizational standards required by the Carnegie Library of Pittsburgh.

Detectives requested notification by Pall Mall employees should any items originally reported to have been stolen were located during this process.

During this second all-inclusive review, (the original audit focusing on areas in which the 1991 audit list items were *supposed* to have been located within the Oliver Room and not the entire room) some items originally thought to be missing were found. Some were in mislabeled boxes, and many of these items did not have call numbers or were not shelved in the correct places.

Pall Mall employees subsequently discovered the following items originally reported as having been removed from the Oliver Room:

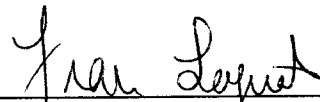
Author	Title	Publisher and Date
Gregory Macalister Mathews	"The Birds of Australia"	London: Witherby & Co., 1910-1927
	"(Colonies) A Map of Virginia and Maryland"	London: Basset and Chiswell, circa 1676
George Eliot	"Silas Marner"	Edinburgh & London: Blackwood, 1861
Paul Kane	"Wanderings of an Artist Among the Indians of North America"	London, 1859
	"Descrizione Delle Architetture, Pitture e Scolture di Vicenza, con Alcune Osservazioni"	Vicenza, 1779
Valerien Kiprianoff	"Histoire Pittoresque de l'Architecture en Russie: Suivie dun Aperçu sur le Climat, les Moeurs et le Developpement de la Civilisation dans ce Pays"	St. Petersburg, 1864
John Shebbeare	"Letter to the People of England"	London, 1756-57
John Claudius Loudon	"An Encyclopaedia of Cottage, Farm, and Villa Architecture and Furniture..."	London: Longman, Orme, Brown, Green, & Longmans, 1839
Neville Craig	"The Olden Time"	Pittsburgh, 1846-48
William Jeremy Bromwell	"Locomotive Sketches, with Pen and Pencil, or, Hints and Suggestions to the Tourist over the Great Central Route from Philadelphia to Pittsburg"	Philadelphia: J.W. Moore, 1854
William Pain	"The Practical Builder, or, Workman's General Assistant: Shewing the Most Approved and Easy Methods for Drawing and Working the Whole or Separate Part of any Building ... Rules of Carpentry ... "	London: Printed for I. Taylor, 1778
James Heath	"Flagellum; or, The Life and Death of Oliver Cromwell"	London, 1663
John Woolman	"The Works of John Woolman."	Philadelphia, 1775
Victor Petit	"Chateaux de la Vallée de la Loire des XV, XVI, et XVIII Siecles"	Paris, 1861
France	"Le Code Noir"	Paris, 1767
John Farey	"A Treatise on the Steam Engine, Historical, Practical, and Descriptive."	London: Longman, Rees, Orme, Brown, and Green, 1827

displayed on the PBS series “Antiques Roadshow”, knowingly conspired to cannibalize the most valuable pieces of a prized collection of works with historic significance to the citizens of Western Pennsylvania. Priore and Schulman’s statements, taken in conjunction with their financial records, their electronic correspondence, and the recovered physical evidence clearly indicate that a lucrative agreement existed between the two parties for years at the expense of the Carnegie Library of Pittsburgh. According to Pall Mall Art Advisors, the staggering scope of these library thefts – resulting in the loss of value of the CLP collection of approximately \$8,066,300 – ranks it among the world’s largest losses to date.

As of this date, the combined efforts of Pall Mall, the District Attorney’s Office, and the art collecting community have led to the recovery of various rare books, plates, and maps belonging to CLP, the estimated value of which totals \$1,152,100.

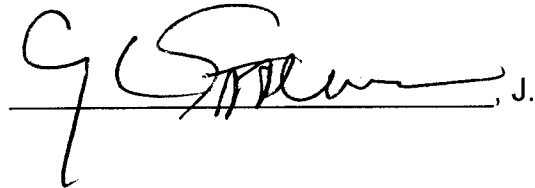
Based upon the aforementioned information which is believed to be true and correct your affiants respectfully request that this criminal complaint be approved, and a warrant of arrest issued for John Ezra Schulman for the following charges:

<u>COUNTS</u>	<u>CHARGES</u>
1	18 PA C.S. 3921 Theft by Unlawful Taking
1	18 PA C.S. 3925 Receiving Stolen Property
1	18 PA C.S. 5111 Dealing in Proceeds of Illegal Activity
1	18 PA C.S. 903 Criminal Conspiracy – Theft
1	18 PA C.S. 903 Criminal Conspiracy – Receiving
1	18 PA C.S. 903 Criminal Conspiracy – Forgery
1	18 PA C.S. 903 Criminal Conspiracy – Retail Theft
1	18 PA C.S. 3929.3A Retail Theft
6	18 PA C.S. 3922 Theft by Deception
2	18 PA C.S. 4101 Forgery
3	18 PA C.S. 4107 Deceptive Business Practices
1	18 PA C.S. 3922 Theft by Deception


Detective Fran Laquatra


Detective Perann Tansmore

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 20th DAY
OF JULY, 2018.


CRAIG C. STEPHENS, J.

CRAIG C. STEPHENS,
MAGISTERIAL DISTRICT JUDGE
MAGISTERIAL DISTRICT 05-2-22
MY COMMISSION EXPIRES ON THE
FIRST MONDAY IN JANUARY, 2022