

COMMONWEALTH OF PENNSYLVANIA
 COUNTY OF BUCKS
 Magisterial District Number: 07-2-02
 MDJ: Hon. MARK D. DOUPLE
 1277 ALMSHOUSE ROAD
 1277 ALMSHOUSE ROAD
 Address: WARRINGTON PA 18976
 Telephone: (215) 343-7961



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

DEFENDANT: (NAME and ADDRESS):
PAUL SYLVESTER FOSTER
 First Name Middle Name Last Name Gen
1142 SNYDER ROAD APT G-4
LANSDALE PA 19446

NCIC Extradition Code Type

1-Felony Full 5-Felony Pend. C-Misdemeanor Surrounding States Distance:
 2-Felony Ltd. 6-Felony Pend. Extradition Determ. D-Misdemeanor No Extradition
 3-Felony Surrounding States A-Misdemeanor Full E-Misdemeanor Pending
 4-Felony No Ext B-Misdemeanor Limited F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed 08/31/21	OTN/LiveScan Number	Complaint/Incident Number 21-006041-2285	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 6/26/1997	POB	Add'l DOB	Co-Defendant(s) <input type="checkbox"/>
AKA First Name Middle Name Last Name Gen.				
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk/Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
EYE COLOR <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number	MNU Number		173	
Defendant Fingerprinted: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				Ft. HEIGHT In.
Fingerprint Classification:				5 11

DEFENDANT VEHICLE INFORMATION

Plate # KFJ6969	State PA	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY)	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN 1FMYU70EX1UA83437	Year 2001	Make FORD	Model EXP	Style	Color WHI		

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, **CHRISTOPHER SCOTT POWER** **28614 200**
 (Name of the Affiant) PSP/MPOETC -Assigned Affiant ID Number and Badge #
 of **Doylestown Township Police** **PA0092700**
 (Identify Department or Agency Represented and Political Subdivision) (Police Agency ORI Number)
 do hereby state: (check appropriate box)
 1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as _____
 I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe
 with violating the penal laws of the Commonwealth of Pennsylvania at **[205] Doylestown Township**
 (Subdivision Code) (Place-Political Subdivision)
ROUTE 202 NEAR THE WELLS ROAD OVERPASS DOYLESTOWN, PA (BUCKS COUNTY)
 in **BUCKS** County [**09**] on or about **08/31/2021 1515**
 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

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Defendant Name	First: PAUL	Middle: SYLVESTER	Last: FOSTER

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.

3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.

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

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

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

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

CHRISTOPHER SCOTT POWER

8/31/2021

(Date)

(Signature of Affiant)

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

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

07-2-02

(Magisterial District Court Number)

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: 08/31/2021	OTN/LiveScan Number	Complaint/Incident Number 21-006041-2285
Defendant Name	First: PAUL	Middle: SYLVESTER	Last: FOSTER

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input checked="" type="checkbox"/>	1	3732	of the	PA Vehicle Code	1	F3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

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

PAVC 3732 Homicide by Vehicle

Acts of the accused associated with this Offense:

PAVC 3732(a) Homicide by Vehicle (F3)

IN THAT, on August 31, 2021, at about 1515 hours, the defendant, PAUL FOSTER, did unintentionally cause the death of another person, namely, Randee Travis, while engaged in the violation of not maintaining his vehicle within a single lane of travel crossed over the yellow center lines and into oncoming traffic and upon doing so caused a two (2) vehicle traffic accident on Route 202 at the Wells Road over pass (Doylestown Township, Bucks County), and the motor vehicle violation caused the death of the victim, Randee Travis, all of which is in violation of Section 3732 of the PA Vehicle Code. (F3)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	2	VC3742.1	(a)	of the	PA Vehicle Code	1	F3	
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

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

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

Acts of the accused associated with this Offense:

PAVC 3742.1(a)(1) Accidents involving death or personal injury while not properly licensed (F3)

IN THAT, on August 31, 2021 at about 1515 hours, the defendant, PAUL FOSTER, did drive, operated and was in actual physical control of a motor vehicle, caused an accident which resulted in serious bodily injury/death to Randee Travis, while not holding a valid driver's license at the time of the accident; to wit: the defendant, PAUL FOSTER, did operate and was in physical control of a motor vehicle on Route 202 (Doylestown Township, Bucks County) and did cause an accident which resulted in the death of Randee Travis, all of which is in violation of Section 3742.1(a) of the PA Vehicle Code. (3742.1(a)(1) - F3)



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The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	3	2504	A	of the	PACC	1	M1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number				<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

involuntary manslaughter

Acts of the accused associated with this Offense:

PACC 2504(a) Involuntary Manslaughter (M1)

IN THAT, on August 31, 2021, at about 1515 hours, the defendant, PAUL FOSTER, did operate a vehicle and did not maintain his vehicle within a single lane of travel, crossed over the yellow center lines and into oncoming traffic and upon doing so caused a two (2) vehicle traffic accident on Route 202 at the Wells Road over pass (Doylestown Township, Bucks County), all of which was done in a reckless or grossly negligent manner, and as a result of the defendant's actions caused the death of the victim, Rande Travis. (M1)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	4	2705		of the	PA Crimes Code	1	M2		90Z
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number				<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone

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

PACC 2705 Recklessly Endangering Another Person

Acts of the accused associated with this Offense:

PACC 2705 Recklessly Endangering Another Person (M2)

IN THAT, on August 31, 2021, at about 1515 hours, the defendant, PAUL FOSTER did recklessly engage in conduct which placed or may have placed the victim, Rande Travis, in danger of death or serious bodily injury by operating his vehicle above the speed limit, did not stay within his lane of travel and upon doing so caused a two (2) vehicle traffic accident, which resulted in the victims death, all of which is in violation of Section 2705 of the PA Crimes Code. (M2).



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	5	3309	of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

PAVC 3309(1) Driving On Roadways Laned For Traffic

Acts of the accused associated with this Offense:

PAVC 3309(1) Driving on Roadways Laned for Traffic (S)

IN THAT, on August 31, 2021, at about 1515 hours, the defendant, PAUL FOSTER did, being the operator of said motor vehicle, fail to drive said vehicle entirely within a single lane at Route 202 in the area of the Wells Road over pass (Doylestown Township, Bucks County), to-wit: the defendant did not stay within his lane of travel crossed over the yellow center lines and into oncoming traffic and upon doing so caused a two (2) vehicle traffic accident, all of which is in violation of Section 3309(1) of the PA Vehicle Code. (S)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	6	3361	of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code
PennDOT Data (if Applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

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

PAVC 3361 Driving Vehicle At Safe Speed

Acts of the accused associated with this Offense:

PAVC 3361 Driving Vehicle at Safe Speed (S)

IN THAT, on August 31, 2021, at about 1515 hours, the defendant, PAUL FOSTER did drive a motor vehicle at a speed greater than was reasonable or prudent for the existing conditions; to-wit: actor did drive said motor vehicle at a speed greater than reasonable or prudent for heavy afternoon rush hour traffic at Route 202 in the area of the Wells Road over pass (Doylestown Township, Bucks County), all of which is in violation of Section 3361 of the PA Vehicle Code. (S)



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Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	7	3736	(a)	of the	PA Vehicle Code	1	S		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

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

PAVC 3736(a) Reckless Driving

Acts of the accused associated with this Offense:

PAVC 3736(a) Reckless Driving

IN THAT, on August 31, 2021, at about 1515 hours, the defendant, PAUL FOSTER did drive a vehicle in willful or wanton disregard for the safety of persons or property, to wit: the defendant did operate his vehicle above the speed limit, did not stay within his lane of travel and upon doing so caused a two (2) vehicle traffic accident, which resulted in the victim's, Rande Travis, death, all of which is in violation of Section 3736(a) of the PA Vehicle Code. (S)



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Defendant Name	First: PAUL	Middle: SYLVESTER	Last: FOSTER

AFFIDAVIT OF PROBABLE CAUSE

Your affiant is Det/Cpl. Christopher S. Power #200 of the Doylestown Township Police Department. Your affiant is ACT 120 certified and has been a sworn municipal police officer since July of 2000. During the course of employment, your affiant has received specialized training in all areas of criminal investigations from various local, state and department agencies. Your affiant has been involved in numerous investigations involving traffic accidents and other related offenses and as a result of those investigations authored numerous criminal complaints resulting in arrest and successful prosecution. Your affiant has knowledge of the following:

On August 31, 2021, hours Doylestown Township officers responded to the area of Route 202 at the Wells Road overpass (Doylestown Township, Bucks County) to investigate the report of a two-vehicle traffic accident. The reports indicated that the accident was a head on collision and one of the involved drivers was unconscious and trapped in her vehicle.

On scene, Doylestown Township officers discovered a white Ford Explorer bearing PA registration KFJ-6969 and a blue Nissan Rogue bearing PA JWF-5685 had been involved in a head-on collision. The white Ford Explorer was resting on its driver's side facing in a northeastern direction on Route 202 and the Nissan Rogue was facing the wrong direction (southwest) resting in the area of the bike/hike path running along NB Route 202. The Ford Explorer and Nissan Rogue both suffered heavy front-end damage.

The driver and lone occupant of the white Ford Explorer, who was later identified by his Military Identification card as Paul Foster, was crawling out of the rear of his vehicle when officers arrived on scene.

The driver and lone occupant of the Nissan Rogue, who was later identified as Randee Travis by her PA OLN, was unconscious and positioned behind the steering column of her vehicle. Travis had to be extricated from her vehicle by Doylestown Fire Company. Central Bucks Ambulance members arrived on scene and pronounced the victim, Randee Travis, deceased at the scene.

The crash investigation determined the white Ford Explorer had been traveling in a southern direction on Route 202. It was determined the Ford Explorer was traveling above the speed limit and left its lane of travel. The Ford Explorer entered into the northbound lane of Route 202 and into the travel lane of the Nissan Rogue. The front end of the Ford Explorer made contact with the driver's side area of the Nissan Rogue in the northbound lane of Route 202.

The crash reconstruction revealed Foster, white Ford Explorer, was traveling at approximately 61 MPH, approximately 21 miles per hour above the posted speed limit. The crash reconstruction revealed Foster crossed the double yellow lines into in-coming traffic, over corrected and drove his Ford Explorer off the right side of the road before again losing control of the vehicle, driving it across both SB and NB lanes before striking the victim's vehicle, Nissan Rogue, head-on at a high rate of speed. The crash reconstruction revealed there was no braking by the Ford Explorer prior to impact.

Your Affiant met with the operator, Paul Foster, of the white Ford Explorer and confirmed he does not have a driver's license. Foster advised your Affiant that he was using Google Maps on his phone, as he was familiar with the area and may have looked down at his phone while driving.



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AFFIDAVIT CONTINUATION PAGE

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AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

Your affiant swears the above facts are true and correct and respectfully requests an arrest warrant be issued for the defendant as per the attached complaint.

I, CHRISTOPHER SCOTT POWER, 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 _____ day of _____, _____.

_____ Date _____, Magisterial District Judge

My commission expires first Monday of January,

